

**IN THE HIGH COURT OF JUDICATURE AT BOMBAY
CIVIL APPELLATE JURISDICTION**

WRIT PETITION NO. 12664 OF 2025

Sushant Bhausahab Sarode
Age 21 years, Occ.- Student,
R/at-Savkarwadi,
Tehsil - Malegaon,
Nashik – 423 208.

... Petitioner

Versus

1. Union of India
Through its Secretary,
Ministry of Home Affairs,
(Department of Personnel
and Training), North Block,
Central Secretariat,
New Delhi.
2. Staff Selection Commission,
Commercial Karmik,
Block No.12,
Central Government Complex,
Lodhi Road,
New Delhi - 110003.
3. The Director General,
CRPF (Recruitment Branch)
East Block 07, Level 4, Sector 1,
R. K. Puram,
New Delhi – 110066.
4. Deputy Commandant,
Member-I (PST & PET),
At - CRPF, Talegaon,
Vishanpuri,
Pune 410 507.

... Respondents

**WITH
WRIT PETITION NO. 12671 OF 2025**

Sahil Sanjay Patil
Age 21 years, Occ.-Student,
R/at-Lingachiwadi, Post Panori,
Tahsil-Radhanagri,
Kolhapur- 416 231.

... Petitioner

Versus

1. Union of India
Through its Secretary,
Ministry of Home Affairs,
(Department of Personnel
and Training), North Block,
Central Secretariat,
New Delhi.
2. Staff Selection Commission,
Commercial Karmik,
Block No.12,
Central Government Complex,
Lodhi Road,
New Delhi - 110003.
3. The Director General,
CRPF (Recruitment Branch)
East Block 07, Level 4, Sector 1,
R. K. Puram,
New Delhi – 110066.
4. Deputy Commandant,
Member-I (PST & PET),
At - CRPF, Talegaon,
Vishanpuri,
Pune 410 507.

... Respondents

Mr. Venkatesh A. Shastry, Advocate for the Petitioner in both Writ Petitions.

Ms. P. B. Chavan a/w Mr. Rui Rodrigues, Counsels for all Respondents in both Writ Petitions .

**CORAM : RAVINDRA V. GHUGE AND
ASHWIN D. BHOBE, JJ.**

**RESERVED ON : 29th SEPTEMBER, 2025
PRONOUNCED ON : 01st OCTOBER, 2025**

JUDGMENT : (*PER ASHWIN D. BHOBE, J.*)

1. Heard Mr. Venkatesh A. Shastry, learned Advocate for the Petitioners and Ms. P. B. Chavan learned Advocate for Respondents. Learned Advocates jointly submits that, since the issues raised in both the Writ Petitions are similar, both these Petitions can be heard together and disposed of by a common Judgment.

2. Rule. Rule made returnable forthwith. Heard both petitions finally with the consent of the learned Advocates appearing for the parties.

3. Petitioners both being 21 years of age are aspirants of joining Central Armed Forces.

4. Petitioners are aggrieved by the PST Rejection Slip, by which the Petitioners are disqualified from appearing for Detailed Medical Examination (“DME”) of Constable (GD) in Central Armed

Police Forces (CAPFs) and SSF, Rifleman (GD) in Assam Rifles, and Sepoy in Narcotics Control Bureau Examination – 2025, on the ground that the height of the Petitioners is less than the prescribed height.

5. Vide Notice dated 5th September 2024 (“*said Notice*”), Respondent No.2 invited applications from eligible candidates, for the post of Constable, General Duty (GD in Central Armed Police Forces (CAPFs) and SSF, Rifleman (GD) in Assam Rifles and Sepoy in Narcotics Control Bureau Examination – 2025. Said Notice prescribes 3 stages for the recruitment of the candidate/s for the said post, viz. (1) Computer Based Examination (“CBT”); (2) Physical Standard Test (“PST”) & Physical Efficiency Test (“PET”); and (3) Detailed Medical Examination (“DME”).

6. Petitioners being eligible and satisfying the requisite qualifications prescribed in the said Notice applied for the said post. Admit cards were issued to the Petitioners to appear for the Computer Based Examination .

7. Petitioners qualified in the Computer Based Examination, as such were called to appear before the Respondent No.4 Board at CRPF, Pune, for Physical Standard Test and Physical Efficiency Test.

Petitioners successfully cleared the Physical Efficiency Test and thereafter underwent the Physical Standard Test.

8. Petitioners were declared disqualified in the Physical Standard Test on the ground that the height of the Petitioner in WP No. 12664 of 2025 was recorded as 164.7 cms, whereas height of the Petitioner in WP No.12671 of 2025 was recorded as 164.6 cms, which was less than the standard height viz. 165 cms, prescribed in the said Notice. Accordingly, Respondent No.4 issued PST Rejection Slip dated 23rd August, 2025 and 25th August, 2025 to the Petitioners.

9. Petitioners are therefore before this Court seeking the following substantive reliefs :-

In Writ Petition No.12664 of 2025:-

“A] That this Honourable High Court be pleased to pass writ of mandamus or the order in the similar nature and extend the benefit of relaxation to the Petitioner as contemplated in clause 2(d) of "Revised Uniform Guidelines" dated 20th May 2015 and thereby to give direction to the Respondents to set aside the Rejection Slip dated 25th August 2025 and declare the Petitioner to be eligible for Detailed Medical Examination (DME).”

In Writ Petition No.12671 of 2025:-

“A] That this Honourable High Court be pleased to pass writ of mandamus or the order in the similar nature and extend the benefit of relaxation to the Petitioner as contemplated in clause 2(d) of "Revised Uniform Guidelines" dated 20th May 2015 and thereby to give

direction to the Respondents to set aside the Rejection Slip dated 23rd August 2025 and declare the Petitioner to be eligible for Detailed Medical Examination (DME).”

10. Mr. V. A. Shastry, learned Advocate for the Petitioner submits that Respondents have erroneously disqualified the Petitioners. He submits that clause 2(d) of Uniform Guidelines for Medical Examination in Central Armed Police Forces and Assam Rifles for GOs & NGOs dated 20th May, 2015 (“*Said Guidelines*”) applicable to the recruitment, lays down that while measuring the height fraction of cm less than 0.5 cm will be ignored and 0.5 cm and more will be rounded off to the next higher cm, standard height. He therefore submits that the Petitioners are entitled to the relaxation in terms of clause 2(d) of the “*Said Guidelines*” and as such are required to be declared as qualified in the Physical Standard Test so as to move to DME. He relies on the orders passed by the Madhya Pradesh High Court in the case of Arun Kalmodiya Vs. Union of India¹; by the Calcutta High Court in the case of Anuj Bala Vs. Union of India² & connected matters; and by the Punjab and Haryana High Court in the case of Union of India Vs. Kuldeep³. He submits that grave prejudice and injury would be caused to

1. Writ Petition No.34269 of 2024 decided 17th February, 2025.

2. Writ Petition No.21766 of 2025 decided on 12th September, 2025.

3. L.P.A. No. 1724 of 2024 decided on 24th July, 2024.

the Petitioners if benefit under clause 2(d) of the “Said Guidelines” is not extended to the Petitioners and therefore seeks indulgence of this Court in its extra ordinary writ jurisdiction.

11. Ms. P. B. Chavan, learned Advocate for the Respondents opposes the present Petition. She submits that the provisions in the Said Guidelines of rounding off the fraction of height is applicable at the stage of Detailed Medical Examination and not at the Physical Standard Test stage. She supports the disqualification of the Petitioners.

12. Having considered the rival contention, the issue which falls for consideration is whether the Petitioners can be given relaxation in the height, in terms of clause 2(d) of the Said Guidelines ?

13. Fact/s of the Petitioners having applied in “Maratha” category; the height of the candidate prescribed for Maratha category being 165 cms; Petitioner in Writ Petition No.12664 of 2025 falling short of 0.3 cm and Petitioner in Writ Petition No. 12671 of 2025 falling short of 0.4 cm, of the requisite height for qualifying in the Physical Standard Test are not in dispute.

14. As per the scheme of examination for the post of Constable, General Duty (GD) in Central Armed Police Forces (CAPFs) and SSF,

Rifleman (GD) in Assam Rifles and Sepoy in Narcotics Control Bureau Examination- 2025, Computer Based Examination (CBT), Physical Standard Test (PST) & Physical Efficiency Test (PET) and Detailed Medical Examination (DME), are mandatory. All these examinations are required to be conducted as per the Said Guidelines.

15. Clause 12, 12.1, 12.2, 12.4, 12.5 and 12.6 of the said Notice relevant for the issue/s as raised in the petitions, are extracted herein below :-

12 Scheme of Examination:-

12.1 Computer-Based Examination : *The Computer-Based Examination will consist of one Objective Type Paper containing 80 questions carrying 2 marks each with the following composition :-*

Part	Subject	Number of Questions	Maximum Marks	Duration/ Time Allowed
Part-A	General Intelligence and Reasoning	20	40	60 Minutes
Part-B	General Knowledge and General Awareness	20	40	
Part-C	Elementary Mathematics	20	40	
Part-D	English / Hindi	20	40	

12.2 Physical Standard Test (PST) Physical Efficiency Test

(PET): *Based on the performance in the CBE, candidates will be shortlisted for PST/PET by the Commission. Physical Standard Test (PST) and Physical Efficiency Test will be conducted at various centres finalized by the CAPFs. Detailed scrutiny of candidates' eligibility/documents will be undertaken at the time of DME/DV. Therefore, it will be the responsibility of the candidates to verify their eligibility as prescribed in this Notice before appearing for CBE/PST/PET. Candidates shortlisted for PST/PET will be asked to go through biometric verification followed by PST/PET. The PST shall include measurements of height, weight & Chest (as applicable).*

12.4 Physical Efficiency Test (PET): *Candidates have to clear the race within the following limits :-*

Event	Male	Female	Remarks
Race	5 Kms in 24 minutes	1.6 Kms in 8 ^{1/2} minutes	For candidates other than those belonging to the Ladakh Region
	1.6 Kms in 7 minutes	800 meters in 5 minutes	For candidate of Ladakh Region

12.5 Physical Standard Test (PST) : *Physical Standard for the posts are as follows:-*

12.5.1 Height :

12.5.1.1 *Male 170 cms*

12.5.1.2 *Female 157 cms*

12.5.1.3 *Few categories of candidates are allowed
relaxation in the heights mentioned above.
Relaxed standard of height for such
candidates are as follows:*

Sr. No.	Relaxation in Height to few categories of Candidate	Male (Cms)	Female (Cms)
(a)	All candidates belonging to Scheduled Tribes.	162.5	150.0
(b)	All Scheduled Tribes Candidates of North Eastern States (NE States).	157.0	147.5
(c)	All Scheduled Tribes Candidates of Left-Wing Extremism affected districts.	160.0	147.5
(d)	Candidates falling in the categories of Garhwalis, Kumaonis Dogras, Marathas and Candidates belonging to the States/ UTs of Assam, Himachal Pradesh, Jammu and Kashmir and Ladakh.	165.0	155.0
(e)	Candidates hailing from the North-Eastern States of Arunachal Pradesh, Manipur, Meghalaya, Mizoram, Nagaland, Sikkim and Tripura.	162.5	152.5
(f)	Candidates hailing from Gorkha Territorial Administration (GTA) comprising of the three Sub-Divisions of Darjeeling District namely Darjeeling, Kalimpong and Kurseong and includes the following "Mouzas" Sub-Division of these Districts: - (1)Lohagarh Tea Garden (2) Lohagarh Forest (3) Rangmohan (4) Barachenga (5) Panighata (6) ChotaAdalpur (7) Paharu (8) Sukna Forest (9) Sukna Part-I (10) Pantapati Forest-I (11) Mahanadi Forest (12) Champasari Forest (13) SalbariChhatpart-II (14) Sitong Forest (15) Sivoke Hill Forest (16) Sivoke Forest (17) ChhotaChenga (18) Nipania.	157.0	152.2

(Emphasis Supplied)

12.6 Medical Examination / Document Verification:

Candidates will be shortlisted for Detailed Medical Examination (DME) / Document Verification from the pool of candidates who qualify the PST / PET.

16. Vide Office Memorandum bearing No. A.VI-1/2014-Rectt (SSB) dated 20th May, 2015, the Government of India, Ministry of Home Affairs, has approved the Guidelines for Recruitment Medical Examination in CAPFs & AR, for implementation. Clause 2 (d) of the Said Guidelines, as relevant are extracted herein below :-

“2. GENERAL INSTRUCTIONS FOR RECRUITMENT BOARD:

d) Measurement of physical standards viz. height, weight, and chest is the responsibility of the Physical Standard Test Board (PST Board) for all categories of candidates i.e GOs, SOs and Ors. Medical officers will not be part of PST board both for Male & Female candidates. Since presence of a female is required at the time of recording of physical standard (PST), a female non medical staff may be associated with PST board. Recruiting medical officer need not record to physical measurements. Recruiting medical officer will mention physical standard in the medical examination form as recorded by the PST board. In borderline cases of overweight, BMI should also be considered to arrive at conclusion and variation of 5Kg +/- from the minimum/maximum limit may be accepted. Similarly while measuring height fraction of cm less than 0.5 will be ignored and 0.5 cm & more will be rounded off to the next higher cm. Standard height- weight chart is attached at ANNEXURE- I.”

(emphasis supplied.)

17. Petitioners have qualified in the Computer Based Examination as well as Physical Efficiency Test. Clause 12.6 of the said Notice makes a reference to candidates from the pool of candidates qualifying the Physical Standard Test (PST) & Physical Efficiency Test (PET) being shortlisted for Detailed Medical Examination (DME) / Document Verification. Petitioners having failed to qualify in the Physical Standard Test due to their height measurements being below the prescribed standard of 165 cms, are precluded from proceeding to the next Detailed Medical Examination stage.

18. Clause 2(d) of the Said Guidelines, which provides for rounding off of the height to the next higher centimeter would be applicable at the stage of Physical Standard Test. The benefit conferred by the Said Guidelines was required to be extended to the Petitioners at the Physical Standard Test stage. Disqualifying the Petitioners at the stage of Physical Standard Test on account of their height being 164.7 cms and 164.6 cms, respectively, is illegal and arbitrary. We are of the considered opinion that the Petitioners are entitled to the benefit of height relaxation in terms of Clause 2(d) of the Said Guidelines by rounding off the fraction of the height to the next higher centimeter.

19. In view of the above, **both the Writ Petitions are allowed** in terms of prayer clause (a). Petitioners are hereby given benefit of the relaxation in terms of Clause 2(d) of the Said Guidelines, consequently Respondents are directed to consider the height of the Petitioner in WP No.12664 of 2025 which is 164.7 cms to be 165 cms and the height of the Petitioner in WP No. 12671 of 2025 which is 164.6 cms to be 165 cms, thereby declaring both the Petition eligible for the Detailed Medical Examination.

20. Rule made absolute in the above terms. There shall be no orders as to costs.

(ASHWIN D. BHOBE, J.)

(RAVINDRA V. GHUGE, J.)

GAYATRI
RAJENDRA
SHIMPI

Digitally signed
by GAYATRI
RAJENDRA
SHIMPI
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