

**IN THE HIGH COURT OF JUDICATURE AT BOMBAY
CIVIL APPELLATE JURISDICTION
WRIT PETITION NO.13359 OF 2025**

Aniket Sunil Jadhav
Age 23 years, Occ.- Student,
R/at – At post Phone bk.
Tal. Dharangaon,
Dist. Jalgaon – 465 105

... 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 – 110 003
3. The Director General,
CRPF (Recruitment Branch)
East Block 07, Level 4, Sector 1,
R. K. Puram,
New Delhi – 110 066
4. Deputy Commandant,
Member-I (PST & PET),
At - CRPF, Talegaon,
Vishanpuri,
Pune 410 507

... Respondents

Mr. Venkatesh A. Shastry for the Petitioner.

Mr. Rui Rodrigues a/w. Mr. Vinit Jain and Ms. Priyanka Chavan for Respondent No.1.

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

DATE : 10th OCTOBER, 2025

ORAL JUDGMENT : (PER RAVINDRA V. GHUGE, J.)

1. Heard Mr. Shastri, the learned Advocate for the Petitioner and Mr. Rodrigues, the learned Advocate for Respondent No.1.

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

3. The Petitioner being 23 years of age is aspirant of joining Central Armed Forces.

4. The Petitioner is aggrieved by the Physical Standard Test (PST) Rejection Slip, by which the Petitioner is 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 Petitioner 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) and Physical Efficiency Test (PET); and (3) Detailed Medical Examination (DME).

6. The Petitioner being eligible and satisfying the requisite qualifications prescribed in the said Notice applied for the said post. Admit card was issued to the Petitioner to appear for the Computer Based Examination.

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

Efficiency Test and thereafter underwent the Physical Standard Test.

8. The Petitioner was declared disqualified in the Physical Standard Test on the ground that the height of the Petitioner was recorded as 169.6 cm, which was less than the standard height viz. 170 cm, prescribed in the said Notice. Accordingly, Respondent No.4 issued PST Rejection Slip dated 2nd September, 2025 to the Petitioner.

9. Petitioner is, therefore, before this Court seeking the following substantive reliefs :-

(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 2nd September, 2025 and declare the Petitioner to be eligible for Detailed Medical Examination (DME).

10. Mr. Shastry, the learned Advocate for the Petitioner submits that Respondents have erroneously disqualified the Petitioner. 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 Petitioner is entitled to the relaxation in terms of clause 2(d) of the “Said Guidelines” and as such is 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 v/s. Union of India*¹; by the Calcutta High Court in the case of *Anuj Bala v/s. Union of India*² and connected matters; and by the Punjab and Haryana High Court in the case of *Union of India v/s. Kuldeep*³. He submits that grave prejudice and injury would be caused to the Petitioner if benefit under clause 2(d) of the “Said Guidelines” is not extended to the Petitioner and, therefore, seeks indulgence of this Court in its extra ordinary writ jurisdiction.

11. Mr. Rodrigues, the learned Advocate for Respondent No.1 opposes the present Petition. He submits that the provisions in the Said Guidelines of rounding off the fraction of height is

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.

applicable at the stage of Detailed Medical Examination and not at the Physical Standard Test stage. He supports the disqualification of the Petitioner.

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

13. The learned Advocate for the Petitioner submits that the minimum height requirement for the “Maratha” category is 165 cm, whereas for the “OBC” category it is 170 cm. The Petitioner has a height of 169.6 cm and falls short by 0.4 cm of the requisite height for qualifying in the Physical Standard Test, which is 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 theses 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	165.0	155.0

	Candidates belonging to the States/ UTs of Assam, Himachal Pradesh, Jammu and Kashmir and Ladakh.		
(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. The Petitioner has 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. The Petitioner having failed to qualify in the Physical Standard Test due to his height

measurement being below the prescribed standard of **170 cms**, is 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 Petitioner at the Physical Standard Test stage. Disqualifying the Petitioner at the stage of Physical Standard Test on account of his height being 169.6 cm, is illegal and arbitrary. We are of the considered opinion that the Petitioner is 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, **this Petition is allowed** in terms of prayer clause (a). The Petitioner is 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 which is 169.6 cm, thereby declaring the Petitioner 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.)