

**RIGHT TO EDUCATION OF GIRLS IN PAKISTAN - A LEGAL EXAMINATION FROM THE  
PERSPECTIVE OF LOW – INCOME HOUSEHOLDS**

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## Abstract

*Education of girls is of vital importance for the success of a country. However, it is viewed that Pakistan has not performed in a promising way in terms of providing education to female children, especially those who belong to low-income groups and rural areas. For this purpose, it is necessary that the provincial and federal legislations are perused to effectively understand the extent of the legal mechanisms which are present currently in Pakistan. Moreover, the jurisprudence of Pakistani courts must also be examined to capture the nuanced reasoning of these courts to protect the fundamental right to education of young girls in Pakistan. Lastly, lessons from foreign jurisprudence and policy experiences also needs to be analyzed to inculcate the positive lessons from those jurisdictions into the Pakistani legal framework.*

**Keywords:** International Human Rights Law, International Covenant of Economic, Social and Cultural Rights, International Covenant of Civil and Political Rights, Right to Education, Constitution of Pakistan, Convention on the Elimination of Discrimination Against Women, Right to Free and Compulsory Education Acts

## - **Introduction**

The concept of education has been pivotal for the evolution of human society. In case of Pakistan, specifically in rural and sub-metropolitan regions, young girls are present generally at the bottom end of the education system. The low rate of literacy among young girls in rural and remote areas is due to the multiple reasons which include economic reasons such as lack of investment in school education of girls as well as the poverty of their parents. There are also legal reasons such as there are no specific laws which deal with the education of young girls. These reasons *inter alia* have resulted in making Pakistan one of the worst performing countries in terms of education for young girls as 32% of primary school age girls are out of school compared to 21% of boys with the situation being worst in Sindh and Baluchistan.<sup>1</sup>

In Baluchistan, it was reported that 81% of the girls did not complete their primary school while 1.8 million children aged between 5-17 are out of school in Khyber-Pakhtunkhwa of which 64% are girls.<sup>2</sup> In light of these abysmal conditions for education of young girls in Pakistan, this research brief shall focus particularly on the legal policy to determine the extent to which legal framework in Pakistan has facilitated to secure school education of girls. Moreover, it shall consider some plausible legal measures in light of the wisdom of foreign courts and local experiences to strengthen the fundamental right to education of Pakistani girls.

## - **Constitutional Injunctions**

There is no doubt that affirmation of a right under law forms the basis of safeguarding and securing that right. Article 25-A of the Constitution of Pakistan recognizes the right to education as a fundamental right for both male and female children. Article 37-B and Article 38-D of the Constitution of Pakistan 1973 further affirms the policy of removing illiteracy and providing education without any kind of discrimination. Although the induction of these articles in the Constitution of Pakistan provides a back-bone for the right to education in the country, but the particularization of the right to education for disadvantaged groups like poor female children seems to be largely ignored in the parliament as well as in the superior courts. Therefore, it is necessary that signals and indications within Pakistani legislations and case-

<sup>1</sup> Ullah DH, "Education for All: The Broken Promise" *Pakistan Today* (Islamabad September 17, 2020)

<sup>2</sup> PTI Govt Urged to Invest More in Education as More than Half of Children in Tribal Areas Are out-of-School, *The Express Tribune* (Islamabad May 26, 2019); Imtiaz M, "Girls' Education" *The Nation* (Islamabad).

laws are highlighted which approve and discuss directly, indirectly, incidentally, and circumstantially the right to education of young girls belonging to low – income households.

- **Use of Purposive Interpretation**

The first indication in the superior courts’ judgments which pave way for the right to education for young girls of low – income households come from the famous *Benazir Bhutto* case. In this case, the Supreme Court of Pakistan affirmed that the Constitution of Pakistan must be read purposively and highlighted that Articles 3, 37 and 38 of the Constitution juxtapose to advance the cause of socio-economic principles and these provisions become in an indirect sense, enforceable by law. The Supreme Court further highlighted that purposively defining rights will serve to guarantee genuine freedom which includes freedom from ignorance and illiteracy.<sup>3</sup>

Incidental to this instructive judgment, mixed and elaborative reading of the right to education with other rights was observed in multiple cases. The courts realized that depriving education from someone is a way of removing a person from his or her right to profession, lawful trade, and business.<sup>4</sup> Similarly, the superior courts also recognized that the meaning of ‘right to life’ has expanded over time. Thus, right to life includes all rights that are necessary for a dignified existence which requires a certain level of education.<sup>5</sup> In light of these judgments and Article 25-A of the Constitution of Pakistan, it could be adduced that the courts in Pakistan do incidentally recognize, through elaborative readings of laws, that depriving a young girl from low – income household from her right to education is actually depriving her from a fruitful life which can allow her to stand on her own feet and access other basic constitutional rights.

- **Affirmative Action**

Article 25 of the Constitution of Pakistan endows the right to equality and specifically guarantees that there shall be no discrimination based on gender. Moreover, right to equality shall not be violated if disadvantaged groups such as poor female children are provided special provision for their uplifting. Article 34 of the Constitution of Pakistan further states that steps

<sup>3</sup> *Benazir Bhutto v. Federation of Pakistan* [1988] PLD 416 (SC).

<sup>4</sup> *Sidra Yasin vs Mrs. Ishrat Ishaq* [2014] PLD 408 (LHC).

<sup>5</sup> *Ahmad Abdullah v Government of Punjab* [2003] PLD 752 (LHC); *Umar Asif Raza v. University of Engineering & Technology* [1997] PLD 594 (LHC).

shall be taken to ensure full participation of women in all spheres of life. Supreme Court of Pakistan also recognized the principle of right to equality of disadvantaged groups when it directed all relevant authorities to ensure that transgender people are provided right to participation in all walks of life including education and that they are treated equally by authorities.<sup>6</sup> The Supreme Court has specifically affirmed the right to education of students from under - privileged areas and their entitlement to receive education under Pakistani Constitution.<sup>7</sup> In *Shirin Munir* case, the Supreme Court reasoned that no discrimination on the basis of sex could be permitted except on the ground of reasonable and intelligible classification which include protection of children.<sup>8</sup>

In light of these case-laws, one can state with considerable legal evidence that space is present in the language of the Constitution of Pakistan, and the subsequent Supreme Court's decisions for providing an affirmative action for girls of low – income backgrounds. The affirmative action shall favour school education of girls from low – income backgrounds in the state's budget to improve provisions of educational facilities to girls. This will be a move for girls to achieve substantive equality in relation to their access to education until the age of 16. This access shall allow them to access dignified living which shall improve equality in all aspects of their life in accordance with the vision of the Article 25 of Pakistani Constitution.

#### - **Explicit Recognition by Superior Courts**

However, it must also be noted that Supreme Court of Pakistan is also needs to provide a clear comprehensive jurisprudence which elaborate the Court's position in relation to a practical legal mechanism for securing the right to education of girls belonging to low – income households in Pakistan. As noted above, consciousness is increasingly observed in superior courts' judgments regarding this issue with some judgments now making a clear reference on this pertinent topic. In one of its cases, the Supreme Court of Pakistan recognized that the significance of the girls' right to education has long-term impacts for the nation as the Court cited that increasing education of girls was one of the reasons of good family planning in low – income households in Bangladesh.<sup>9</sup> In *Raja Khurram Ali*, the Islamabad High Court noted that domestic work of a girl provided an environment where right to education was deprived

<sup>6</sup> *Dr. Muhammad Aslam Khaki vs. S.S.P (Operations)* [2013] P L D 188 (SC).

<sup>7</sup> *Fiaqat Hussain v Federation of Pakistan* [2012] PLD 224 (SC).

<sup>8</sup> *Shirin Munir and others v. Government of Punjab and another* [1990] PLD 295 (SC).

<sup>9</sup> [2019] SCMR 247, Human Rights Case No. 17599 Of 2018.

from that girl of low – income household and made her a subject to many violations of her fundamental rights.<sup>10</sup> Similarly, in *Subay Khan*, the absence of the right to education was considered directly related to the fact that overwhelmingly girls belonging to low – income households are working as domestic workers and are not provided the right to education.<sup>11</sup>

#### - Legal Obligations under International Laws

Pakistan has signed and ratified several international treaties which put a positive obligation on the Pakistani state to protect the right to education of young girls belonging to low – income households. Under Article 13 of the International Covenant of Economic, Social and Cultural Rights (“ICESCR”), Pakistan is bound to recognize the right of everyone to education; to direct education to the full development of the human personality and the sense of its dignity, and to enable all persons to participate effectively in a free society.<sup>12</sup> Similarly, under Article 28 of the Convention on the Rights of Children (“CRC”), Pakistan must recognize the right to education of the children on the basis of equal opportunity; and should take measures to encourage regular attendance at schools as well as to ensure that drop-out rates are reduced.<sup>13</sup> Moreover, Article 10 of the Convention on the Elimination of Discrimination Against Women (“CEDAW”) creates an obligation on Pakistan to take all appropriate measures to eliminate discrimination against young female children in order to ensure they have equal rights in the field of education. CEDAW also obliges Pakistan to recognize, on a basis of equality of genders, the same conditions in vocational guidance, access to education, the reduction of female student drop-out rates and the organization of programs for girls who have left school prematurely.<sup>14</sup>

Furthermore, Girls’ Right Education Program (“GREP”) is an agreement Pakistan has entered with UNESCO for the protection of the right to education of young girls. In February 2014, the Government of Pakistan and UNESCO signed the Funds-in-Trust agreement for establishing the overarching program to support national capacity building to realize right to education of young girls in Pakistan from low – income households. The purpose of the program is to support the government’s efforts in increasing accessibility and improving the

<sup>10</sup> *Raja Khurram Ali v Tayyaba Bibi* [2019] YLR 98.

<sup>11</sup> *Subay Khan v Secretary Labor* [2019] LHC 302 [17], [20].

<sup>12</sup> International Covenant on Economic Social and Cultural Rights (ICESCR), Art. 13. Pakistan signed the treaty on 3 November 2004 and ratified on 17 April 2008.

<sup>13</sup> Convention on the Rights of the Child (CRC), Art. 28. Pakistan signed the treaty on 20 September 1990 and ratified on 12 November 1990.

<sup>14</sup> Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), Art. 10. Pakistan ratified the treaty on 12 March 1996.



quality of primary education of young girls through capacity building and targeted interventions at both institutional and community level.<sup>15</sup>

### - **Legal Obligations under Domestic Laws**

The state of Pakistan is defined under Article 7 of the Constitution of Pakistan, and includes both the provincial and federal legislatures as well as their governments. Therefore, the positive duty of the state requires that legislations be passed by the respective legislatures to secure educational needs of young girls while the government also fulfills the financial and logistical needs necessary for securing girls’ education. After the inclusion of Article 25-A in the Constitution of Pakistan, Right to Free and Compulsory Education Acts (“RTE”) were passed by all the legislatures of the country. RTE Acts specifically include female child’s education within their ambit. Islamabad RTE provides positive duties for the state which the state should carry out without any discrimination based on sex. These duties include providing finances for schools; providing medical and dental check-ups; conducting training of teachers and providing all necessary equipment including laboratories and playgrounds.<sup>16</sup> Islamabad RTE also provides a negative duty with no discrimination for girls. These duties include not to use screening and capitation fee in schools; not to expel a child before the end of the compulsory education and not to corporally punish a child.<sup>17</sup>

Due to the recent nature of RTE Acts, much case-law elaborating RTE provisions is not present which clearly elucidate the application of RTEs on young female children belonging to low – income households. However, several superior courts’ judgments do elaborate the general positive obligations of state for securing right to education of children of low – income households. Many superior courts’ judgments affirm that government must provide all budgetary allocations to the schools of both genders and recover land, if necessary, for the schools.<sup>18</sup> The state simply cannot escape liability to provide a justiciable right on the basis of budgetary constraints.<sup>19</sup> Similarly, it has also been affirmed in the courts that provision of education should be in the best possible environment, including no discrimination in relation

<sup>15</sup> ‘Girls’ Right to Education Program in Pakistan’ (UNESCO, 2018) <<https://unesdoc.unesco.org/ark:/48223/pf0000265885>> accessed 24 February 2023

<sup>16</sup> Right to Free and Compulsory Education Act 2012, Section 3, 6, and 7.

<sup>17</sup> Right to Free and Compulsory Education Act 2012, Section 11 and 13.

<sup>18</sup> [2014] SCMR 396; *Government Girls College Kuchlak vs. Government of Balochistan* [2012] C 168 Const. Petition 577 of 2011.

<sup>19</sup> *Ghulam Mustafa v Province of Sindh* [2010] CLC 1383 (Karachi).

to sports facilities; adequate training of teachers and all necessary infrastructure including textbooks and reasonable buildings.<sup>20</sup>

- **Lacunae in RTEs**

Unfortunately, despite all of these elaborate legislative measures, none of the RTEs explicitly provided specific provisions for securing the right to education of girls from low – income households.<sup>21</sup> In this way, it attempts to treat unequal groups under equal terms without realizing the specific experience of the weaker group i.e., poor female children. Perusal of RTE Acts, however, does provide some implicit special provisions for low – income girls. For instance, section 2 (d) of Islamabad RTE defines a disadvantaged child as someone who belongs to a socially and economically disadvantaged class or group and section 3(f) of Islamabad RTE provides that non-payment of any fees shall not result in the discrimination of disadvantaged child. Therefore, it can be considered that Islamabad RTE provides some space for poor female children who can be easily classified as a disadvantaged group. However, no special provision is present in the Islamabad RTE for girls in relation to their medical needs and social problems like family burdens imposed upon them at a young age which may prevent them from adhering to normal school procedures.

If Islamabad RTE is compared to other provincial RTEs, those RTEs even fail to provide the safeguards for girls which Islamabad RTE provides for securing the right to education of girls of low – income households. Sindh RTE seems to be similar to Islamabad RTE in regard to both positive and negative aspects. However, it is even more restricted in terms of special provisions as it includes special provisions for girls belonging to disadvantaged class only if they are not enrolled in school before 5 years.<sup>22</sup>

Punjab and KPK RTEs fails to address any of the problems mentioned in the Sindh RTE and Islamabad RTE. KPK RTE does not even provide any special provision for disadvantaged groups while both Punjab RTE and KPK RTE do not contain holistic educational measures such as training of teachers and provision of laboratories and playgrounds for low – income children.<sup>23</sup> Baluchistan RTE is the lacks the most in the country

<sup>20</sup> *Akhtar Hussain Langove vs IGP* [2015] YLR 58 (Balochistan); *Syed Nazeer Agha vs Government of Balochistan* [2014] PLD 86 (Balochistan); Human Rights Case No. 19360-P OF 2012, [2013] SCMR 54; [2014] SCMR 396 Const. Petition 37 of 2012.

<sup>21</sup> Right to Free and Compulsory Education Act 2012, Section 2(e).

<sup>22</sup> Sindh Right of Children to Free and Compulsory Education Act 2013, Section 4.

<sup>23</sup> The KPK Free Compulsory Primary and Secondary Education Act, 2017; The Punjab Free and Compulsory Education Act 2014.

in terms of securing right to education for girls belonging to low – income backgrounds as it disregards the positive provisions of Punjab, Sindh, and Islamabad RTEs. An interesting provision in this legislation is the presence of a legal section which establishes a localized elected management committee.<sup>24</sup> This is a double – edged sword as it might further serve to preserve those elements of the province which may be averse to girls` education. However, the ‘consensus spirit’ and ‘cultural deference’ of this provision is also recognizable which can serve as a source of sustainable inclusive better system for young girls.

#### - Analysis of a Foreign Jurisdiction

For the purposes of this essay, the South African jurisdiction shall be perused to understand more issues which restrict the struggle to secure the right to education for girls. The South African legal regime provides a good example for the Pakistani legal system as it views the issue in a holistic manner which understand the context from which girls are coming to school rather than viewing the matter in a plain manner. According to the UN, although South Africa has the highest rate of children who have access to primary education (96%) and secondary level (70%), girls and young women participation in economy is lesser.<sup>25</sup> The girls in South Africa are also at a disadvantage but the impediment for girls in South Africa, in order to secure education, is more due to sexual violence against girls and due to epidemics. Girls face sexual assault in schools from both fellow students and teachers. These occurrences cause girls to fear going to school.<sup>26</sup> Moreover, the violence against girls in the townships is extremely high and due to many schools being far from children`s homes, the girls are exposed to the risk of violence on their travels to and from school.<sup>27</sup>

At around 7.1 million, South Africa also has the most people living with HIV/AIDS in the world. Girls are also often forced to drop out of school to care for family members living with HIV/AIDS which limits girls` opportunities to pursue careers.<sup>28</sup> Considering these facts, South Africa was presumably failing to comply with following international and regional instruments which make South Africa bound to protect girls` right to education:

<sup>24</sup> THE Balochistan Free and Compulsory Education Act 2014, Section 4.

<sup>25</sup> Mary Zeiss Stange, Carol K. Oyster, J. Geoffrey Golson, (eds), ‘The Multimedia Encyclopedia of Women in Today’s World’ (SAGE, 2013) <[https://www.academia.edu/3881033/ Girls\\_Education\\_Movement\\_Africa](https://www.academia.edu/3881033/ Girls_Education_Movement_Africa)> accessed 24 February 2023.

<sup>26</sup> Laura Turner, ‘10 FACTS ABOUT GIRLS’ EDUCATION IN SOUTH AFRICA’ (The Borgen Project, 12 July 2018) <<https://borgenproject.org/facts-about-girls-education-in-south-africa/>> accessed 21 February 2023.

<sup>27</sup> Ibid.

<sup>28</sup> Ibid.

- International Covenant on Economic, Social and Cultural Rights (ICESCR) <sup>29</sup>
- Convention on the Rights of the Child (CRC) <sup>30</sup>
- Convention on the Elimination of Discrimination against Women (CEDAW) <sup>31</sup>
- The African Charter on the Rights and Welfare of the Child (ACRWC) <sup>32</sup>
- Africa Youth Charter (AYC) <sup>33</sup>
- Constitutional Protection of the Right to Education <sup>34</sup>
- South African Schools Act No. 84 of 1996 <sup>35</sup>
- National Education Policy Act No. 27 of 1996 <sup>36</sup>

In light of these multitude of applicable laws in the South African state, which require it to observe all considerations for determining an issue of education of girls, the judiciary in South Africa has played a positive role in protecting the right to education of girls from low – income households. In two jointly decided cases in 2013, two South African high schools adopted policies which resulted in automatic exclusion from school if a student is pregnant.<sup>37</sup> The head of the provincial department of education ordered the school to ignore this policy and reinstate the students in such a case. The Constitutional Court, in this case, ruled that such policies *prima facie* violated constitutional principles. Moreover, the violations should be addressed by the scheme of powers under the School Act of 1996. The court held that the policies discriminated based on pregnancy and gender as it limits the right to education of young girls by making them repeat an entire year of school. Moreover, the policies *prima facie* even violated students’ rights to human dignity, bodily integrity and psychological integrity by

<sup>29</sup> (n9). South Africa has signed but not ratified the treaty, which might imply that it is not legally bound by its provisions. However, in the *Grootboom* judgment, for example the Constitutional Court has relied extensively on the ICESCR in interpreting the socio-economic rights provisions enshrined in the South African Constitution.

<sup>30</sup> (n10). The Convention was ratified by South Africa in 1995.

<sup>31</sup> (n.11). South Africa has signed and ratified the Convention.

<sup>32</sup> The African Charter on the Rights and Welfare of the Child (ACRWC), Article 11 provides for the right to education for every child and in section (3) enjoins States Parties to the convention to take all appropriate measures with a view to achieving the full realization of the right and more specifically obliges States Parties in section 3(e) to ‘take special measures in respect of female, gifted and disadvantaged children, to ensure equal access to education for all sections of the community.

<sup>33</sup> Africa Youth Charter (AYC), Article 13 states that every young person shall have the right to education of good quality, education of young people shall be directed to the promotion and holistic development of the young person’s cognitive and creative and emotional abilities to their full potential.

<sup>34</sup> The Constitution of the Republic of South Africa 1996, Section 29 provides as follows: Everyone has the right-

(i) To a basic education, including adult basic education; and

(ii) To further education, which the state, through reasonable measures, must make progressively available and accessible.

Section 9 provides for equal protection and equality of opportunity, and Sub-sections (3) ad (4) of Section 9 further state that:

(a) The state may not unfairly discriminate directly or indirectly against anyone on one or more grounds, including race, gender, sex, pregnancy, marital status, ethnic or social origin, color, sexual orientation, age, disability, religion, conscience, belief, culture, language, and birth.

(b) No person may unfairly discriminate directly or indirectly against anyone on one or more grounds in terms of subsection (3). National legislation must be enacted to prevent or prohibit unfair discrimination (emphasis added).

<sup>35</sup> South African Schools Act 1996, Article 5(1) of the Act prohibits any form of discrimination against learners and makes schooling compulsory for all children for at least the first levels of education, while also emphasizing that there should be no discrimination between boys and girls.

<sup>36</sup> National Education Policy Act 1996, The Act mandates the Ministry of Education with the implementation of the policy, which should be directed at “achieving equitable education opportunities and the redress of past inequality in education provision, including the promotion of gender equality and the advancement of the status of women.

<sup>37</sup> Head of Department, Department of Education, Free State Province v. Welkom High School & another; Head of Department, Department of Education, Free State Province v. Harmony High School & another (CCT 103/12) [2013] ZACC 25, 2013 (9) BCLR 989(CC); [2014] (2) SA 228 (CC) (10 July 2013).

requiring them to report their own pregnancy. Finally, the policies violated the best interests of the child because they failed to consider the health of the pregnant students.<sup>38</sup> Thus, South African Constitutional Court viewed the matter in such a way that all facets of human rights violations which were impregnated in this localized matter were considered in regard to its intertwined nature. This approach should be instructive for the judiciary in Pakistan, for securing the right to education of girls belonging to low – income households, especially when considering matters which are taboo in the country.

### - **Conclusion**

Policy makers must increasingly realize that, while dealing with the rural areas of the country, it is important to understand the geographic, demographic, and economic status of the community in order to successfully address the pressing issues in this region.<sup>39</sup> Therefore, for securing education for girls in areas such as the Newly Merged Districts in KPK, education planning must be based on real-time data and keeping in view of the needs of the local community and the realities on the ground as each district is unique in terms of terrain, demographic characteristics, economic realities and the perception of residents about girls' education.<sup>40</sup>

Moreover, education must also be in consonance with the 21st century realities that equip girls with skills that help them to provide for their families and themselves resulting in motivation for both parents and girls. Hence, in addition to the removal of legal lacunas as mentioned in the legal analysis of this article, a voucher system should be introduced to increase the number of girls being sent to schools belonging to low – income households. Since education is still unfortunately privatized, specific non – exchangeable vouchers should be given to low – income parents, who can choose between public and private schools according to their accessibility while voucher money can help schools to improve their quality.<sup>41</sup>

<sup>38</sup> Ibid

<sup>39</sup> Naveed, S (2018). Echidna Global Scholars Program Policy Paper: *'The importance of educating girls in the Newly Merged Districts of KP, Pakistan'*.

<sup>40</sup> A., & Jones, M. (2018). Why context matters: a comparative perspective on education reform and policy implementation. *Educational Research for Policy and Practice*, 17(3), 195–207. <<https://link.springer.com/article/10.1007/s10671-018-9231-9#citeas>> accessed 24 February 2023.

<sup>41</sup> Andrabi & Khawaja, (2010). IGC International Growth Centre – Pakistan. *Education Policy in Pakistan: A Framework for Reform*.

As opposed to the outward approach focusing mainly on working with private sector organizations to enhance the capacity of the education department for girls, a second approach is recommended that focuses inwards on improving capacity through effective monitoring mechanisms within the education department.<sup>42</sup> These monitoring mechanisms shall be complemented with availability of transport or building schools within close proximity. This approach, therefore, calls for a more decentralized locally integrated system of education in terms of logistics with national digital oversight in relation to financing as it shall speed-up the decision-making process; leave less room for corruption since there shall be direct transparent connection between the populace, local officials and the higher officials. Such an approach shall also help the officials to cater to the unique needs of that particular area resulting in lesser use of funds. This way of execution is particularly important as 60 percent of girls are not going to school because of long distances, particularly in the middle and high schools; similar problems are also reported by female teachers.<sup>43</sup> Thus, close monitoring of institutions shall also reduce the phenomenon of 'ghost schools'.<sup>44</sup>

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<sup>42</sup> Alford, J., & O'Flynn, J. (2012). *Rethinking public service delivery* (1st ed.). Houndmills, Basingstoke, Hampshire: Palgrave Macmillan.; Farrulsaqlain, M. 'Improving Girl Education in Pakistan'.

<sup>43</sup> Naveed, S (2018). Echidna Global Scholars Program Policy Paper: '*The importance of educating girls in the Newly Merged Districts of KP, Pakistan*'.

<sup>44</sup> Stuteville, S (2009). GlobalPost, *The ghost schools of Pakistan*.