

Policy Framework for Regulation of Virtual Schools in ICT

1. Background, Introduction and Rationale:

Islamabad Capital Territory - Private Educational Institutions Regulatory Authority (ICT-PEIRA) was established under Islamabad Capital Territory Private Educational Institutions (Regulation and Promotion) Ordinance, 2006 with the mandate to register and regulate Private Educational Institutions (PEIs) within the territorial jurisdiction of Islamabad Capital Territory (ICT), offering education up to Intermediate or equivalent Level. However, in March 2013, the Islamabad Capital Territory Private Educational Institutions (Registration & Regulation) Act, 2013 (the “Act”) was enacted with the mandate to register and regulate PEIs within ICT.

Recent digital reforms by the Authority have successfully shifted the registration and renewal of registration processes via online mode which demonstrates the capacity for effective digital governance. At present, around 83% of private schools in ICT fall in low-fee category, indicating market sensitivity to operational cost, Whereas, virtual schools offer lower-cost alternative to expensive physical infrastructure of schooling, making quality education more accessible.

However, non-regulation of virtual schools has resulted non-availability of data of students, studying in these virtual private schools, lack of conformity to curriculum standards with Federal Scheme of Studies, qualifications of teachers and other regulatory matters.

2. Definition & Scope of Virtual School:

A "Virtual School" is defined as an entity that provides instructions leading to a formal qualification, up to Grade 12 or equivalent level and does not primarily rely on physical classrooms infrastructure for daily instructional delivery rather utilizes Learning Management Systems (LMS) as its primary mode of curriculum delivery/ instructions.

S.#	Level	Grades	Key Regulatory Focus
1	Primary	Up to 5	Foundational literacy, screen time limits, and parental involvement.
2	Middle	6–8	Subject diversification and formative assessment.
3	Secondary/ “O” Level	9–10	Board examination preparation (FBISE or any foreign board, whichever is applicable), practicals (hybrid), and subject specialization.
4	Higher Secondary/“A” Level or equivalent	11–12	Streams (Pre-Medical, Pre-Engineering, Commerce, Humanities, medical and other technologies.

3. Registration Requirements / Overall Inspection and Monitoring Framework for Virtual School:

a. Basic Infrastructure / Requirements for Inspection and Registration of Virtual Schools:

S.#.	Regulatory Feature	Monitoring Mechanism
1	Physical Address	While instruction is virtual, the school shall have a registered Administrative Office in ICT for operational services and parental contacts.
2	Teaching Competencies	Teachers shall have specific certifications in digital pedagogy in addition to regular degrees and certifications.
3	Audio/Video studio (min 400 sq ft, soundproof, chroma sheet, lighting)	One central recording studio on the given address along with infrastructure for live instructions along with electricity backup mechanism.
4	Dedicated 100 MBPS internet (primary + backup) minimum	Verified by PEIRA via speed tests.
5	Learning Management System (LMS) with student database maintained at PEIRA	The applicant shall prove ownership of or licensing for a secure Learning Management Systems (LMS) with data servers that shall comply with Pakistani laws. PEIRA shall have admin-level read-only access to attendance, grades, and content logs.
6	Server: Apache/Cloud VPS, SSD, 10TB+ storage, DDoS protection, SSL, structured database, daily backups, etc.	Dedicated in-house server or cloud-based local hosting.
7	Fire wall for data and web access protection along with anti-virus, web security (injection, XSS, CSRF), edge caching, load balancing	Annual cybersecurity audit report shall be submitted to the Authority.
8	Software: lecture recording, video editing, graphic design, distance learning	Complete digital information for lecture recording and live instructions
9	Microphone (high quality), video camera(s), laptop/PC	Complete digital information for lecture recording and live instructions
10	Digital teacher registry with photo, CNIC, degrees, and experience certificates.	Complete digital information for lecture recording and live instructions

b. Curriculum & Assessment (All Levels)

- i. Digital content shall be aligned with National Curriculum of Pakistan and a "Certificate" to this effect, shall be submitted by the management of virtual school along with application for registration.
- ii. LMS shall be compatible to record, submission and grading of oral and written assignments of objective and subjective nature.

- iii. LMS tracks login/logout/activity of Screen time = 75% of allocated time for all classes.
- iv. Term-wise formative assessment results shall be submitted to the Authority to assess quality of learning and student's outcomes.
- v. Student's assessment shall also include projects, presentations and practical learning among other strategies.
- vi. Student's wellbeing, cyber security, mental health support and data privacy of students shall be ensured by the management.

c. Details of Level-Wise Regulatory Framework / Requirements for Inspection, Registration & Monitoring:

i. Primary Level (Classes 1–5)

S.#	Regulatory Feature	Monitoring Mechanism
1	Maximum screen time per day	3 hours (live + recorded).
2	Parent/guardian role	Mandatory parent orientation on quarterly basis for conveying the progress of the students.
3	Assessment	Term-end online quiz proctored via AI along with portfolio of assignments as well as Zoom-style live invigilation through web-cam, microphone and screen sharing to verify the identity of students.
4	Teacher's Qualification and Specific E-Learning Competencies	14 years education + 2 years teaching experience or relevant diploma along with certification in digital pedagogy.
5	Monitoring	PEIRA shall use different monitoring techniques including unannounced virtual class observations as and when deemed appropriate.

ii. Middle Level (Classes 6–8)

S.#	Regulatory Feature	Monitoring Mechanism
1	Maximum screen time per day	4.5 hours.
2	Subjects	Science, Mathematics, English, Urdu, Islamiyat, Social Studies, Computer Literacy.
3	Assessment	Term-end online quiz proctored via AI along with portfolio of assignments as well as Zoom-style live invigilation through web-cam, microphone and screen sharing to verify the identity of students for key subjects in English, Mathematics and Science.
4	Teacher's Qualification and Specific E-Learning Competencies	16 years education (preferred) or 14 years education with 5 years of experience along with certification in digital pedagogy.
5	Monitoring	PEIRA shall use different monitoring techniques including unannounced virtual class observations as and when deemed appropriate.

iii. **Secondary Level (Classes 9–10) & “O” Level:**

S.#	Regulatory Feature	Monitoring Mechanism
1	Maximum screen time per day	6 hours (including recorded content).
2	Board affiliation	Virtual schools shall be affiliated with FBISE or any Foreign Board (as the case may be).
3	Laboratory requirement	Science streams: MoU with the Physical FBISE or any Foreign Board affiliated school for physics/chemistry/biology laboratories. CS stream: Physical Computer laboratory (15 PCs, 300 sq. ft) at the virtual school’s administrative office or partner school.
4	Examinations	Final qualification (SSC) exams by FBISE only. The virtual school shall arrange a physical examination center (an existing FBISE-affiliated school or a temporary hall) and bear the costs.
5	Teacher’s Qualification and Specific E-Learning Competencies	16 years education in a relevant subject + 3 years of experience along with certification in digital pedagogy.
6	Monitoring	PEIRA shall use different monitoring techniques including unannounced virtual class observations as and when deemed appropriate.

iv. **Higher Secondary Level (Classes 11–12) & “A” Level:**

S.#	Regulatory Feature	Monitoring Mechanism
1	Maximum screen time per day	6 hours.
2	Streams offered	Pre-Medical, Pre-Engineering, Commerce, Computer Science, Humanities including laboratory technologies.
3	Laboratory requirement	Science streams: MoU with the Physical FBISE or any Foreign Board affiliated school for physics/chemistry/biology laboratories. CS stream: Physical Computer laboratory (15 PCs, 300 sq.ft) at the virtual school’s administrative office or partner school.
4	Teacher’s Qualification and Specific E-Learning Competencies	16 years education in relevant subject + 5 years teachers experience (relaxable to 3 years for rare subjects) along with certification in digital pedagogy.
5	Examinations	Same as secondary. Practical exams (science) shall be held at a partner FBISE-affiliated physical school with laboratory facilities; cost borne by the virtual school.
6	Monitoring	PEIRA shall use different monitoring techniques including unannounced virtual class observations as and when deemed appropriate.

4. **Fee Regulation for Virtual School:**

- i. Virtual schools shall provide a clear breakdown of "Monthly Tuition Fee" and all other types of fees to be charged from the students and their parents

under various heads at the time of filing the application for registration. Tuition fee charged by the management of institution will be notified/finalized after the consultation with the Authority.

- ii. Annual increase in fees, if any, shall be subject to prior approval of the Authority and the Authority shall process such applications under relevant provisions of Islamabad Capital Territory Private Educational Institutions (Registration, Regulation & Promotion) Rules, 2024.

5. Regulatory/Registration Fee for Processing of Applications for Registration of Virtual Schools:

Regulatory / registration fee for processing of applications for registration of virtual schools shall be charged thrice of the fee notified vide Schedule-II (A) of Islamabad Capital Territory Private Educational Institutions (Regulation, Regulation and Promotion) Rules, 2024. In addition to this, regulatory fine for violations, if any, shall be imposed thrice the fine notified vide Schedule 2(b) of Islamabad Capital Territory Private Educational Institutions (Regulation, Regulation and Promotion) Rules, 2024.

6. Monitoring & Enforcement Mechanism:

a. Every registered virtual school shall provide to the Authority a secure, read-only admin account to access:

- i. Daily student attendance (login/logout/session duration).
- ii. Teacher-submitted grades and assignment records.
- iii. Content repository (to verify alignment with National Curriculum).
- iv. Live class links (for unannounced observations).

b. Submission of Annual Compliance Report by virtual school:

The virtual school shall submit annual compliance report to the Authority with the following:

- i. List of enrolled students (class-wise).
- ii. Teacher registry (with any changes from prior year).
- iii. MoUs with partner physical schools for practical's/exams.
- iv. Cybersecurity audit certificate (third-party).
- v. Proof of daily backups.

7. General Provisions:

In addition to the above, provision of the Islamabad Capital Territory Private Educational Institutions (Registration & Regulation) Act, 2013 and Islamabad Capital Territory Private Educational Institutions (Registration, Regulation and Promotion) Rules, 2024 shall also be applicable on the virtual schools. Registration shall be awarded upon completion to the inspection parameters.