

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CAMP COURT ABBOTTABAD.

Appeal No. 1046/2013

(Mst. Tehseen Alam-vs-Director, E&SE, KPK, Peshawar etc.)

16.02.2015

JUDGMENT

MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN: Appellant with counsel present. Preliminary arguments heard and record perused.

Learned counsel for the appellant argued that the appellant is serving as Lab Assistant since 24.6.1993. That fresh posts were advertised in Education Department Haripur vide advertisement published in daily 'AAJ' dated 23.5.2011 (Annexure-F page-15). That the appellant applied to the post of C.T (BPS-9) but she was not considered by the respondents where-after she preferred departmental appeal and then the instant appeal.

Learned counsel for the appellant failed to convince this Tribunal that fresh appointment to a newly advertised post falls within the domain of terms and conditions of service of the appellant. Since the grievances of the appellant do not fall within the ambit of terms and conditions of the appellant as such the appeal is not maintainable and dismissed in limine.

File be consigned to the record.

ANNOUNCED

16.02.2015

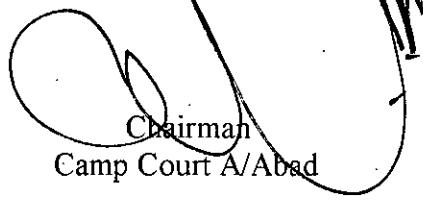
  
(Muhammad Azim Khan Afridi)  
Chairman

16.02.15

4-

21.01.2014

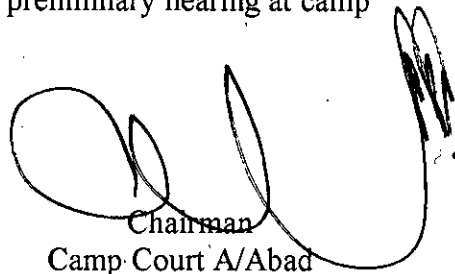
Neither appellant nor her counsel present. To come up for preliminary hearing at camp court A/Abad on 20.5.2014.

  
Chairman  
Camp Court A/Abad

5-

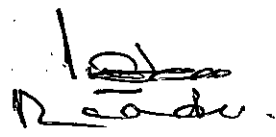
20.5.2014

Appellant present in person, and requested for adjournment due to strike of the Bar. To come up for preliminary hearing at camp court A/Abad on 17.11.2014.

  
Chairman  
Camp Court A/Abad

17-11-14:-

*counsel for the appellant present  
the Tribunal is incomplete. To come up  
for preliminary hearing at camp court  
A/Abad on 16-02-15.*

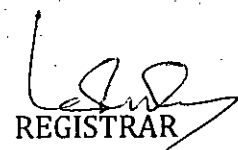
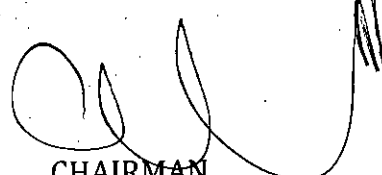

  
Reader.



Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 1046 /2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08/07/2013	<p>The appeal of Mst. Tehseen Alam presented today by Mr. Khurram Iqbal Qazi Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	7.8.13	<p>This case is entrusted to Touring Bench Abbottabad for preliminary hearing to be put up there on <u>20-1-14</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
3.	20.01.2014	<p>Appellant present in person, and requested for adjournment, and also fixation of the case for preliminary hearing tomorrow, due to pre-occupation of her counsel at Haripur. To come up for preliminary hearing on 21.01.2014.</p> <p style="text-align: right;"> Chairman Camp Court A/Abad</p>

**BEFORE THE KHYBER PAKHTOONKHUWA SERVICE TRIBUNAL,  
PESHAWAR.**

*Appeal No. 1046/13*

Mst. Tehseen Alam D/o Shah Alam Khan, R/o House No.9, Aziz Abad, Noor Colony,  
TNT District Haripur.

**...APPELLANT**

**VERSUS**

Director Elementary And Secondary Education, Government of Khyber Pakhtoonkhuwa,  
Peshawar & 3 Others.

**...RESPONDENTS**

**APPEAL**

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4.	Copies of relevant certificate from the concerned Principal	"B" i-ii-iii	9-10-11
5.	Copies of BSc, MA and CT	"C", "D" & "E"	12-13-14
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*Tehseen*  
**...APPELLANT**

Through:

*[Signature]*

**(KHURRAM IQBAL QAZI)**  
Advocate High Court, Abbottabad.

Dated:- *8/7* /2013

**BEFORE THE KHYBER PAKHTOONKHUWA SERVICE TRIBUNAL,  
PESHAWAR.**

*Appeal No. 1046/13*

Mst. Tehseen Alam D/o Shah Alam Khan, R/o House No.9, Aziz Abad, Noor Colony,  
TNT District Haripur.

**...APPELLANT**

**VERSUS**

1. Director Elementary And Secondary Education, Government of Khyber Pakhtoonkhuwa, Peshawar.
2. Executive District Officer (E&S) Education, Haripur.
3. District Education Officer Female, Haripur.
4. Government of KPK through Secretary Education Department, Peshawar.

*08/7/13*

**...RESPONDENTS**

=====

APPEAL AGAINST THE ORDER OF RESPONDENT NO.2,  
AND ORDER OF RESPONDENT NO.1 DATED 08.05.2013  
VIDE WHICH RESPONDENT NO.1 HAS SENT THE APPEAL  
OF APPELLANT TO RESPONDENT NO.3 FOR DECISION.

=====

**PRAYER:-**

THE ORDERS OF THE RESPONDENT NO.1 & 2  
BE DECLARED ILLEGAL, VOID, AND INEFFECTIVE AS  
AGAINST THE RIGHTS OF THE APPELLANT AND AS  
SUCH NULL AND VOID. FOR FURTHER ORDERS THAT  
THE APPELLANT MAY KINDLY BE ORDERED TO BE  
APPOINTED AGAINST THE C.T POST FROM THE DATE,  
THE OTHER CANDIDATES WERE APPOINTED AS SUCH  
KEEPING IN VIEW MY SENIORITY WITH ALL BACK  
BENEFITS.

=====

*8/7/13*

Respectfully Sheweth,

1. That, the appellant was appointed as Lab Assistant vide order No.7156-62 dated 24-06-1993 issued by the DEO (Female). *(Copy is attached as Annexure "A")*
2. That, since then the appellant has been performing her duties to the entire satisfaction of her superiors and presently teaching at Government Girls Higher Secondary School Sirikot.
3. That, at the time of recruitment the appellant had the qualification of F.A and PTC.
4. That, the appellant besides her duties has been teaching major subjects as Maths, English and General Science. *(Copies of relevant certificate from the concerned Principal are attached as Annexure "B")*
5. That, with the passage of time the appellant improved her qualification and passed her BSc exams in the year 1999, M.A in the year 2006, CT in the year 2005. *(Copies of BSc, MA and CT are attached as Annexure "C", "D" & "E")*
6. That, EDO (E&S) Education Haripur invited applications for certain posts in Education Department Haripur vide advertisement published in Daily Aaj dated 23/05/2011. *(Copy of the advertisement is attached as Annexure "F")*
7. That, the appellant being qualify applied for the post of CT, appeared in written exams conducted by (ETEA) and appeared in the interview, was declared successful and placed at serial No.38 of the merit list.
8. That, to the utter disappointment of the appellant she was ignored and those placed after her in the merit list were given appointments.

9. That, the appellant approached the EDO (E&S) Education Haripur through different applications for removing the injustice to her but of no avail. The appellant also approached the DCO Haripur for doing justice to her, but against it proved futile. *(Copies of the applications are attached as Annexure "G", "H" & "I")*
10. That, the action of the EDO, (E&S) Education Haripur is wrong, illegal against the Constitution and the rights of the appellants have untenable.
11. That, the appellant has been deprived of her rights without any rime and reason and is the result of his whims.
12. That, the appellant disappointed filed the Departmental Service appeal before respondent No.1. *(The copy of appeal is attached as Annexure "J")*
13. That, the respondent No.1 sent a copy of the appeal to respondent No.3 vide his letter No.862-63 dated 08.05.2013. *(Copy is attached as Annexure "K")*
14. That, the respondent No.3 so far has taken no action on the above letter, hence this appeal.
15. That, the action of respondent No.1 is not in accordance with the law and rules. He was bound to decide categorically the appeal of the appellant after hearing the parties but he has failed to perform his duties in accordance with the law and rules.
16. That, respondent No.3 has also failed to act in accordance with the direction of respondent No.1 and as such this appeal is being filed to avoid the legal limitation.

It is, therefore, humbly prayed that by accepting this appeal and setting aside the orders of the respondent No.1 & 3, the respondents may please be directed to appoint the appellant against

the C.T Post from the date, the other candidates were appointed keeping in view seniority and other back benefits.

Dated:- 8/7/2013

*Tahseen*

**TEHSEEN ALAM**

**Ø/o Shah Alam Khan**

**Resident of : House No.09, Aziz  
Abad, Noor Colony, T&T,  
District Haripur.**

**APPELLANT**

**Through Counsel:** *Atul*

**VERIFICATION:-**

*Khuram Iqbal Qazi (Adv)*

It is verified that all the contents of the appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed therein.

Dated:- 8/7/2013

*Tahseen*  
**TEHSEEN ALAM**



**BEFORE THE KHYBER PAKHTOONKHUWA SERVICE TRIBUNAL,  
PESHAWAR.**

Mst. Tehseen Alam D/o Shah Alam Khan, R/o House No.9, Aziz Abad, Noor Colony,  
TNT District Haripur.

**...APPELLANT**

**VERSUS**

Director Elementary And Secondary Education, Government of Khyber Pakhtoonkhuwa,  
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**...RESPONDENTS**

**APPEAL**

**AFFIDAVIT**

I, Mst. Tehseen Alam D/o Shah Alam Khan, R/o House No.9, Aziz Abad, Noor Colony,  
TNT District Haripur *Appellant*, do hereby solemnly affirm and declare on Oath that the  
contents of instant *Appeal* are true and correct to the best of my knowledge and belief and  
that nothing has been concealed from this Hon'ble Court.

*Tehseen*  
**DEPONENT**

Dated:- 8/7 /2013

*Tehseen*  
**...APPELLANT**

**IDENTIFIED BY:-**

*Khurram Iqbal Qazi*

**KHURRAM IQBAL QAZI**  
Advocate High Court, Abbottabad.

**BEFORE THE KHYBER PAKHTOONKHUWA SERVICE TRIBUNAL,  
PESHAWAR.**

Mst. Tehseen Alam D/o Shah Alam Khan, R/o House No.9, Aziz Abad, Noor Colony,  
TNT District Haripur.

**...APPELLANT**

**VERSUS**

Director Elementary And Secondary Education, Government of Khyber Pakhtoonkhuwa,  
Peshawar & 3 Others.

**...RESPONDENTS**

**APPEAL**  
**CERTIFICATE**

*Certified that no such Appeal has earlier been filed before this Hon'ble  
Tribunal.*

*Tehseen*  
**...APPELLANT**

Through:

Dated:- 8/7 /2013

*(Signature)*  
**(KHURRAM IQBAL QAZI)**  
Advocate High Court, Abbottabad.

**BEFORE THE KHYBER PAKHTOONKHUWA SERVICE TRIBUNAL,  
PESHAWAR.**

Mst. Tehseen Alam D/o Shah Alam Khan, R/o House No.9, Aziz Abad, Noor Colony,  
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Peshawar & 3 Others.

...RESPONDENTS

**APPEAL**

**ADDRESSES OF THE PARTIES**

**Respectfully Sheweth,**

The addresses of the parties are as under;

**APPELLANT:**

Mst. Tehseen Alam D/o Shah Alam Khan, R/o House No.9, Aziz Abad, Noor Colony,  
TNT District Haripur.

**RESPONDENTS:**

1. Director Elementary And Secondary Education, Government of Khyber Pakhtoonkhuwa,  
Peshawar.
2. Executive District Officer (E&S) Education, Haripur.
3. District Education Officer Female, Haripur.
4. Government of KPK through Secretary Education Department, Peshawar.

*Tahseen*

...APPELLANT

Through:

*[Signature]*

**(KHURRAM IQBAL QAZI)**  
Advocate High Court, Abbottabad.

Dated:- 8/2 /2013

OFFICE OF THE DISTRICT COLLECTOR OFFICE (FEMALE) BUDHAKOTI ARMOYTABAD.

OFFICE ORDER NO. 24/6/95.

A. APPOINTMENT:

The following approved candidates are hereby appointed against the newly created posts of LAs; Assistant at Govt. Girls Higher Secondary School Khanpur D No. 1095/A plus usual allowances as admissible under the rules in D.P. 7 No. 1095-60-10/5 with effect from their dates of taking over charge in the interest of public service:-

S.No.	Name of Candidates with Address	Remarks.
1.	Mrs; Tehena Alam D/O Saah Alam Khan r/o T.L. Haripur Ever Colony	Against newly created LAS; Assistant post/.
2.	Mrs; Shazia Bibi D/O Yaxir Akhbar r/o Khanpur	do
3.	Mrs; Bushra Khatoon D/O Akbar Rahman r/o Ikander Har Haripur.	do
4.	Mrs; Faleem Bibi D/O Muhammad Ashrafat D/O Khanpur.	do

Note:- Charge reports should be submitted in duplicate. No TA/DA/TA is allowed.

CONDITIONS:

- The appointments of above noted candidates are purely on temporary basis liable for termination at any time without assigning a reason or prior notice.
- They should have to produce the Medical and Health certificate from the Medical Officer, District Hospital, Haripur.
- The head of institution is required to check the original Medical Certificate before handing over charge.
- They are not handed over charge if age is less than 15 years or above 25 years.
- If any one of above candidates wish to resign from service they should deposit one month pay in lieu of short notice or one month prior notice.
- The appointments are automatically cancelled if the candidate fails to join the within 10 days of the issued of this order.

(MRS. SAHIBA KHALIL) DISTRICT COMMISSIONER (FEMALE) BUDHAKOTI ARMOYTABAD.

Encl: 7156-62

Copy to :-

- Principal Govt. Girls Higher Secondary Khanpur (Haripur).
- District Accounts officer Haripur.
- Divisional Director of Education (I) Rawalpindi Division Abbottabad.
- Head Accounts Local office.
- Candidates concerned.
- Office file.

Attested  
 Khuram Ishaq  
 DISTRICT COMMISSIONER (FEMALE)  
 BUDHAKOTI ARMOYTABAD.

TO WHOM IT MAY CONCERN

Date: May 26, 2011.

This is to certify that **Mrs. TAHSEEN ALAM** was employed in Government Girls Higher Secondary School Khanpur since July 3, 1993 as a **Lab Assistant**. During her tenure with us, she competently handled major responsibilities as a teacher also. Her major subjects included:

- ♣ Mathematics
- ♣ English
- ♣ General Science.

*Attested*  
*Khanam*  
 ADVOCATE, HIGH COURT  
 ABBOTTABAD

We have found her to be a duty bound, a highly committed and motivated team player with strong conceptual knowledge about her subjects.

We wish her all success in her future endeavors.

*FA*  
**FOUZIA BIBI**  
 S. 21 STAMBA  
 G.G.H.S.S Khanpur Principal

G.G.H.S.S Khanpur

Signature

*[Signature]*  
 26/5/2011

Stamp

G.G.H.S.S Khanpur

To Whom It May Concern

It is certified that Mrs. TEHSEEN ALAM D/O SHAH ALAM KHAN teaching Mathematics, English & General Science to higher classes since 3 July, 1993 in G.G.H.S.S. KHANPUR & January 2007 in G.G.H.S.S BANDI MUNEEM. She is very studious & intellectual teacher. She has always shown good moral character to her pupils. She has shown 100% result throughout her teaching career.

*[Handwritten Signature]*  
**FOUZIA BIBI**  
S.S Islamiat  
GGHSS Khanpur

*[Handwritten Signature]*  
*[Handwritten Signature]*

*[Handwritten Signature]*  
HIGH COURT  
ABBOTTABAD.

Principal  
G.G.H.S.S Bandi Muneem.

Signature *[Handwritten Signature]*

Stamp \_\_\_\_\_

Principal  
G.G.H.S.S.  
Bandi Muneem Haripur

(11)

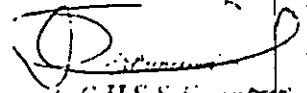
TO WHOM IT MAY CONCERN.

ANNEXTURE B iii

Dated: May 30, 2011.

This is certify that Mrs Tehseen Alam was employed in Education Department since July 3, 1993 as a Lab Assistant and now she is serving her duties in GGHSS Khanpur (she also teach G.Science, Maths to 8<sup>th</sup>, 9<sup>th</sup>, 10<sup>th</sup> classes). I have no

no objection.



Principal GGHSS Khanpur

Attested

Khuram Syed Qureshi  
ADVOCATE, HIGH COURT  
ABBOTTABAD



# University of Peshawar (Pakistan)

Session SUPPLEMENTARY 1999

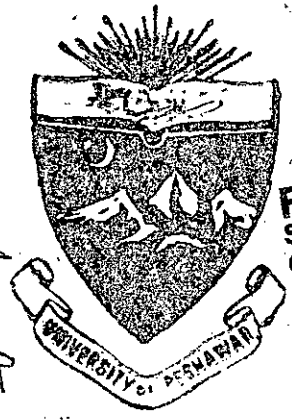
TANSEEN ALAM DAUGHTER of SHAH ALAM KHAN and a student  
of GOVT. GIRLS COLLEGE HARIPUR having passed the prescribed  
examination held in FEBRUARY 2000 is this day admitted by the University  
of Peshawar to the Degree of  
**Bachelor of Science**  
in the THIRD Division  
The Examination was taken as ~~a whole~~ in parts

(12)

Serial N<sup>o</sup> 015634

Registration No. 89-81-1071  
Roll No. 2934  
Result declared on APRIL 28, 2000

*Handwritten signature*  
AMOCAL, HUGH COVENS  
ABBOTTABAD



*Handwritten signature*  
**FOUZIA BIBI**  
S.S Islamiat  
GGHSS Khanpur

*Handwritten signature*  
Registrar

Countersigned

*Handwritten signature*  
Vice-Chancellor

ANNEXURE C



ANNEXTURE D

Serial No. 001234

جامعة hazards

Registration No. 05-P-3747

Roll No. 8680

# HAZARA UNIVERSITY

Mansehra, Pakistan



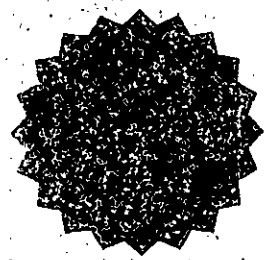
*Altaf*

*Khuram Iqbal*  
ADVOCATE, HIGH COURT  
ABBOTTABAD

The University in recognition of the fulfilment of prescribed requirements has conferred upon  
Mr / Ms Tahseen Alam Son / Daughter of Shah Alam Khan

The Degree of **MASTER OF ARTS** in Islamiyat  
in the examination field in Aug, 2006 session Annual 2006

He / She was placed in Second Division / Grade / EGPA.  
The examination was taken as a Whole.



*[Signature]*

Controller of Examinations

Date 7-2-2007

*[Signature]*  
**FOUZIA BIBI**  
S.S. Isamia  
GGHSS Khanpur

Vice Chancellor

*[Signature]*

Registrar

13

(14)

ANNEXURE E  
Serial No 76606

# Alama Iqbal Open University Islamabad



Certified that *Mr/Ms* **TEHSEEN ALAM**  
*Son/Daughter of* **SHAH ALAM KHAN**  
*Registration No.* **98 NHP 0291** *Roll No.* **H 6120418**  
*Semester* **AUTUMN 2004** *having met all the requirements*  
*under the semester system is this day awarded the*

## Certificate of Teaching *Attested*

*Khussam*  
ADVOCATE, HIGH COURT  
ABBOTTABAD.

*He/She has secured* **55 %** *marks*  
*and has been placed in* **C** *grade*

*AA*

**FOUZIA BIBI**  
S.S Islamia  
GGHSS Khanpur



*[Signature]*  
Controller of Examinations

Result declared on: **July 14,2005**

Date of issue: **December 9,2005**

The detail of courses passed is as under

Course code	Title of the course	Percentage of Marks obtained
631	Dimensions in Education	48
632	Educational Psychology	46
633	School Organization and Management	60
634	English and its Teaching	53
638	Teaching Strategies	48
612	Workshop and Teaching Practice	73
604	Teaching of Urdu	49
607	Teaching of Science	51
635	Teaching of Islamiat	63

Deputy Controller  
Allama Iqbal Open University  
Islamabad

Total credit hours	XXX	Obtained / Total marks	491 / 900
Total credits AIUO	5	Cumulative grade point average	XXX
First semester:	SPRING 1998	Final semester	AUTUMN 2004

Grading Scheme	
80% and above:	A+ grade
70% to 79%	A grade
60% to 69%	B grade
50% to 59%	C grade
40% to 49%	D grade
Below 40%	Fail

Controller of Examinations



محنت جناب ای ڈی. او صاحب ایجوکیشن ڈیپارٹمنٹ ضلع ہری پور

ANNEXURE 6 جناب عالی

مضمون :- درخواست برائے تعیناتی C.T شیجر

1۔ گزارش ہے کہ میرا تقرر مورخہ 07-07-1993ء کو بطور لیب اسٹنٹ ہوا۔ شروع سے ان تک میں کلاس O.P.H اور 10th کو Maths پڑھا رہی ہوں۔ اور اس کے علاوہ انگلش اور جنرل سائنس بھی پائی کلاسز کو پڑھاتی رہی ہوں۔ عوام الناس مجھے Maths کی شیجر کی حیثیت سے جانتے ہیں۔ جبکہ حکمہ تعلیم ہمیں نان ٹیچنگ سٹاف کہتا ہے اور ہمیں ٹیچنگ کاکوٹی Benefit بھی نہیں دیا جاتا اور پوری سروس میں ان تک کوئی پرموشن بھی نہیں دی گئی۔

2۔ 2004ء سے میں C.T پوسٹ کے لیے Apply کر رہی ہوں مگر مجھے اب تک پوسٹ نہیں ملی۔ اس میں نے ETEA ٹیسٹ دیا ہے۔ جس میں 20% لوگ پاس ہوئے اور میں نے اس ٹیسٹ میں 216/300 نمبر حاصل کر کے 3rd پوزیشن حاصل کی ہے۔ لیکن فائنل لسٹ میں میرا نام شامل نہیں کیا گیا اور پوچھنے پر بتایا گیا کہ C.T شیجر کی لسٹ میں میرا نمبر 38 واں ہے۔ فائنل لسٹ میں اس لیے شامل نہیں کیا گیا کہ میں average ہوں۔ جس میں نے بتایا کہ میں In service ہوں تو جواب ملا کہ میں نان ٹیچنگ سٹاف ہوں اس لیے میرا ٹیچنگ کا تجربہ نہیں ہے۔ حالانکہ ایجوکیشن ڈیپارٹمنٹ جانتا ہے کہ ہم

گذشتہ 19 سال سے ٹیچنگ کر رہے ہیں۔ اب یہ سود بانہ گزارش ہے کہ مجھے C.T پوسٹ دی جاوے اس وقت کی سکولوں میں C.T پوسٹ خالی ہے۔ اور میرے علم کے مطابق کھاریاں میں بھی اب تک C.T پوسٹ خالی

Strongly Recommended for Appointment. I have no objection at G.G.H.S - Khurian

RAJA FAISAL ZAMAN Member Provincial Assembly (P.E.S. Haripur)

الاعزاز

سز تحمین عالم لیب اسٹنٹ کورنگٹ رولز بائیس سیکڑوں

Khuriaan Haripur District ADVOCATE

نوڈ بائہ گزارش ہے کہ آپکی توجہ میں دوسری بار اپنی شہرہ میںوں کی طرف دلانا چاہتی ہوں اس امید کے ساتھ کہ شاید آپ میرے دکھوں کا مددگار کریں۔

اس سے قبل پہلی اپیل میں نے آپ کے آفس میں بابو بشارت صاحب کے پاس 2011-6-13 کو جمع کرائی تھی۔ جو کہ پرنسپل فائزرہ صاحبہ کے لیے اسسٹنٹ کے ساتھ روڈیے کے بارے میں تھی۔ اور آج یہ دوسری اپیل ایجوکیشن آفس زناہ ہری پور کے بارے میں آپ سے کر رہی ہوں امید ہے کہ آپ ضرور ہمارے اس مسئلے پر غور فرمائیں گے۔

جناب والا! مسئلہ کچھ یوں ہے کہ 23-5-2011 کو "روزنامہ آج" ایسٹ آباد میں C.T ، PST اور کچھ دیگر پوسٹوں کے متعلق اشتہار پڑھا۔ اور C.T پوسٹ کے لیے اپلای کر دیا۔ اور اس میں ETEA ٹیسٹ کے لیے رول نمبر 0576 ہے۔ کاغذات وغیرہ کی فولڈ کاپیاں کرائیں۔ ایٹا کے لیے 400 روپے کا ڈرافٹ بنوایا در در کے دھکے کھائے۔ ذہنی اور جسمانی پریشانی برداشت کی۔ اور پھر 2011-6-22 کے گرم ترین دن کو دھوپ میں بیٹھ کر ETEA کا ٹیسٹ دیا۔ اور پھر اس ٹیسٹ میں جہاں 80% لوگ فیل ہوئے اور 20% پاس ہوئے۔ ان 20% لوگوں میں میری تیسری پوزیشن بنتی ہے۔ اور میں نے 216/300 نمبر حاصل کیے ہیں۔ اب میرٹ لسٹ میں میرا 38 واں نمبر ہے اور فائنل لسٹ میں چھ شامل نہیں کیا گیا۔

میں جب ایجوکیشن آفس والوں سے پوچھا تو پتہ چلا کہ 60% کوٹہ service رک لوگوں کا ہے۔ اور وہ ٹیچنگ سٹاف ہیں۔ باقی 40% اوپن میرٹ پر جتنی ہوگی اور ان میں ہم 'over age' ہو۔ جبکہ ہمارے پاس جو اشتہار ہے اس میں ٹیچنگ سٹاف یا نان ٹیچنگ سٹاف کا کوئی ذکر نہیں ہے۔ بلکہ یہ ذکر ہے کہ "دو سالہ سرکاری ملازمت سرانجام دینے والے سرکاری ملازمین کے لیے 10 سال کی رعایت ہوگی"۔

جناب والا! براہ مہربانی یہ بھی واضح فرمائیں کہ 19 سال سے Lab/Asstt کے طور پر کام کرے اور ہائر سیکنڈری سکول خاں پور اور ہارڈی مینم میں انفلس، Maths اور سائنس کی کلاسز کو 19 سال تک پڑھانے کے بعد بھی میں service رک اور

15/10/2011  
ج. زناہ

ہیں تو پھر کیا ہوں -

جبکہ میرے پاس پرنسپل صاحبہ کی طرف سے دیئے گئے ٹیچنگ کے سرٹیفکیٹ بھی موجود ہیں۔ اور اس کے علاوہ ایجوکیشن آفیس کی طرف سے سال 2005 اور سال 2006 کی تشریحی اسناد بھی موجود ہیں جن کی فوٹو کاپیاں بھی اس اپیل کے ساتھ موجود ہیں۔

جناب والا! اوپر کی ساری تفصیل کے بعد آپ سے یہی درد مندانہ اپیل ہے کہ آپ ہی بتائیں ہم کدھر جائیں۔ ہم نے 19 برس پہلے لیٹ اسٹڈ بھرتی ہو کر ایسا کون سا کبیرہ گناہ کر دیا ہے کہ جسکی کوئی معافی، تلافی ایجوکیشن ڈیپارٹمنٹ کے پاس نہیں ہے۔ اور لیٹ اسٹڈ کے لیے 19 سال سروس کرنے کے بعد کوئی پرموشن بھی نہیں ہے۔

اور اگر وہ اپنی تعلیم جاری رکھ کر B.A ، Bsc ، C.T اور M.A وغیرہ کر کے C.T پوسٹ کے لیے Apply کرے تو بھی وہ نان ٹیچنگ سٹافی ہے۔ اور اس کے ترقی کا کوئی راستہ نہیں ہے۔

دہریاں اگر راستہ ہے تو وہ یہ کہ لیٹ اسٹڈ SET اور S.S کی جگہ پر دن میں پانچ پانچ اور سات سات پیریڈ سے اور پھر بھی نان ٹیچنگ ہی رہے اور اپنے حق میں آواز بھی نہ اٹھائے۔

جناب عالی!

23 مئی کو ”روزنامہ آج“ ایٹ آباد میں ایجوکیشن ڈیپارٹمنٹ کا بھرتی کا اشتہار پڑھنے کے بعد ایک آس اور امید دل میں تھی کہ شاید 19 سالہ دکھوں کا مداوا ہو جائے۔ مگر پانچ ماہ کے طویل انتظار، مسلسل تکلیف پریشانی اور ذہنی کوفت کے بعد بھی آج وہیں کھڑے ہیں جہاں سے سفر کا آغاز کیا تھا اور آج بھی ہاتھ بالکل خالی ہیں۔

لیکن پھر بھی اس امید کے ساتھ یہ اپیل بندو رہی ہوں کہ جناب! ہماری اس اپیل کو غور و خوض کے بعد شرف قبولیت بخشیں گے۔ اور ہمارے ساتھ اس مسلسل نا انصافی کا ازالہ کریں گے۔

Attested

Khuram Iqbal Dani  
ADVOCATE HIGH COURT  
ABDUL KADIR

آپنی فرماں بردار  
تعمیر عالم - لیٹ اسٹڈ  
گورنمنٹ گریجویٹ سیکولر سکول - خاچپور  
ضلع ہری پور -

خدمت جناب ای ڈی او صاحب ایلیمنٹری سیکولری ایجوکیشن

ANNEXTURE

جناب عالی

ANNEXTURE I

گزارش ہے کہ ہم گزشتہ اٹھارہ برس سے گورنمنٹ گراؤنڈ پر  
 سیکولری سکول خانیور میں بحیثیت ٹیچر کام کر رہے ہیں۔  
 جبکہ ہماری پوسٹ لیٹ اسٹنٹ ہے اور کام ہم سے C.T اور  
 S.E.T کے برابر لیا جاتا ہے۔ ہمیں ٹیچنگ کرنے کا کوئی فائدہ حاصل نہیں ہوتا۔  
 ہم نہ ہی کوئی کورس کر سکتے ہیں اور نہ ہی کوئی امتحانی ڈیوٹی۔  
 کیونکہ ہم نان ٹیچنگ سٹاف ہیں اور ابھی تک ہمارا سکیل 07 ہے۔  
 اٹھارہ سال گزارنے کے باوجود ہماری کوئی پرموشن نہیں ہوئی۔  
 آپ سے گزارش ہے کہ پرموشن کے سلسلے میں ہماری مدد کی جائے۔  
 ہم تاحیات آپ کے شکر گزار رہیں گے۔

1/6  
 Principal  
 G.O.H.S.S Khanpur  
 26.02.11

العارضین

- 1- مسز تحسین عالم Tachseem
- 2- مسز شازیہ بی بی Shaziah
- 3- مسز کلثوم بی بی Kalthum
- 4- مسز شگفتہ ناز Shaghtana

لیٹ اسٹنٹ گورنمنٹ گراؤنڈ سیکولری سکول خانیور

Attested  
 Khairuddin Farid Daxi  
 ADVOCATE HIGH COURT  
 POTTABAD



(19)

APPEAL BEFORE DIRECTOR (E&S) EDUCATION,  
K.P.K, PESHAWAR.

ANNEXTURE J  
2 pages

Subject: SERVICE APPEAL AGAINST THE ACTION OF THE EDO (E & S) EDUCATION HARIPUR;

Sir,

Most respectfully it is submitted as under;

1. That, the appellant was appointed as Lab Assistant vide order No.7156-62 dated 24-06-1993 issued by the DEO (Female). *(Copy is attached as Annexure "A")*
2. That, since then the appellant has been performing her duties to the entire satisfaction of her superiors and presently teaching at Government Girls Higher Secondary School Sirikot.
3. That, at the time of recruitment the appellant had the qualification of F.A and PTC.
4. That, the appellant besides her duties has been teaching major subjects as Maths, English and General Science. *(Copies of relevant certificate from the concerned Principal are attached as Annexure "B")*
5. That, with the passage of time the appellant improved her qualification and passed her BSc exams in the year 1999, M.A in the year 2006, CT in the year 2005. *(Copies of BSc, MA and CT are attached as Annexure "C", "D" & "E")*
6. That, EDO (E&S) Education Haripur invited applications for certain posts in Education Department Haripur vide advertisement published in Daily Aaj dated 23/05/2011. *(Copy of the advertisement is attached as Annexure "F")*
7. That, the appellant being qualify applied for the post of CT, appeared in written exams conducted by (ETEA) and appeared in the interview, was declared successful and placed at serial No.38 of the merit list.
8. That, to the utter disappointment of the appellant she was ignored and those placed after her in the merit list were given appointments.

Attested  
Khanam Sahib Darsi  
ADVOCATE  
PESHAWAR

9. That, the appellant approached the EDO (E&S) Education Haripur through different applications for removing the injustice to her but of no avail. The appellant also approached the DCO Haripur for doing justice to her, but against it proved futile. *(Copies of the applications are attached as Annexure "G", "H" & "I")*
10. That, the action of the EDO, (E&S) Education Haripur is wrong, illegal against the Constitution and the rights of the appellants have untenable.
11. That, the appellant has been deprived of her rights without any rime and reason and is the result of his whims.

It is, therefore, humbly prayed that by setting aside the order of the EDO (E&S) Education, Haripur the appellant may be ordered to be appointed against the CT post from the date of her deprivation of her valuable rights with all back benefits.

Yours obediently;

Dated:-11/03/2013

*Tabseem*  
TEHSEEN ALAM

D/o Shah Alam Khan

Resident of : House No.09, Aziz  
Abad, Noor Colony, T&T,  
District Haripur.

Contact No: 0334-5427940

**VERIFICATION:-**

It is verified that all the contents of the appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed therein.

Dated:-11/03/2013

*Tabseem*  
TEHSEEN ALAM

*Attested*  
*Khuram Iqbal Darsi*  
ADVOCATE, HIGH COURT  
ABBOTTABAD.

20

DIRECTORATE OF ELEMENTARY &  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR

NO. \_\_\_\_\_ /F.No.70/Appeal (F) Teacher KPK

DATED PESHAWAR THE: 8/5 /2013.

To

The District Education Officer (F)  
Haripur

ANNEXTURE K

Subject: - SERVICE APPEAL AGAINST THE ACTION OF THE EDO (E&SE)  
HARIPUR

Memo:-

I am directed to enclose herewith a copy of an appeal in respect of Mst. Tehseen Alam D/O Shah Alam Khan Resident of House No.09 Aziz Abad Noor Colony, T&T District Haripur which is self-explanatory for necessary action under the rules /policy.

Deputy Director (Female)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Endst: No. 862-63

Copy for information to the:-

1. Mst. Tehseen Alam D/O Shah Alam Khan Resident of House No.09 Aziz Abad Noor Colony, T&T District Haripur.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

Deputy Director (Female)  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Attested  
*Khussam Iqbal Daxi*  
ADVOCATE, HIGH COURT  
ABBOTTABAD.

## وکالت نامہ

کورٹ فیس

قیمتی

بعدالت ضیاء الحق نونوالا سرس سز سونل سکھعنوان: مسما نون حسن عالم بنام ڈاکٹر بلکیش ایلنگھان انڈسٹریل سٹریٹجیمنجانب: اسد انٹ مسما نون حسن عالمنوعیت مقدمہ: سرس اپیل

## باعث تحریر آنکے

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

اس کے لئے کافی ضمیمہ امثال سے اپنے مقدمے میں کر رہا

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب

موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء

وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور

کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار

بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول

ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔

نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف

پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناش بصیغہ مفلسی کے دائرہ کرنے اور اس کی

پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

Accepted

المرقوم: 8/7/2013

بمقام: اسد انٹ

Khusam Iqbal Daxi

ADVOCATE, HIGH COURT

ABUETTARAD.

کسٹم عالم و فیس سماہ عارفان سکندر پور  
13302-0451934-0

APPLICATION FORM FOR POST OF CT Female only

1. Name of Applicant (in block letter) TAHSEEN ALAM  
 2. Father Name SHAH ALAM KHAN  
 3. Date of Birth (As per SSC) 30-03-1968  
 4. Date of Passing CT Examination 14-07-2005  
 5. Domicile (Village & P/O) (Village CHAM P/O Kotnajibullah Distt Haripur)  
 6. Age on (31-12-2008) Years 40 Month 09 Days 01  
 7. In case of In Service Teacher D/O 1st appointment 03-07-1993 / Present School with GG HSS Bandi Muneem.  
 post Lab Asstt.

S.No.	Exam: Passed	Roll No.	Year of Passing University / Board	Result Declared on	Total Marks	Marks Obtained Division	Score as per Formula	Remarks
1.	SSC	711	1985	8-8-1985	850	510/1st	15	
2.	FA/FSc	69495	1989	-	1100	523/2nd	12	
3.	BA/BSc	2934	1999	28-4-2000	550	240/3rd	04	
4.	MA/MSc	8680	2006	7-2-2007	1100	606/2nd	06	
5.	CT	H6120418	2005	14-07-2005	900	491/2nd	14	

PTC- 2364 1993 25-19-1993 | 681/2nd 681/2nd

SSC =  $\frac{\text{Marks Obtained} \times 25}{\text{Total Marks}}$  FA/FSc =  $\frac{\text{Marks Obtained} \times 25}{\text{Total Marks}}$   
 BA/BSc =  $\frac{\text{Marks Obtained} \times 10}{\text{Total Marks}}$  MA/MSc =  $\frac{\text{Marks Obtained} \times 10}{\text{Total Marks}}$  CT =  $\frac{\text{Marks Obtained} \times 25}{\text{Total Marks}}$

Note:- In case of inservice Teachers in Govt. Schools, the additional marks will be awarded as under:  
 One Year Qualifying Service = 02  
 Two Years Qualifying Service = 03  
 Three Years or More Qualifying Service = 05

تعمیراتی کمیشن کی نقول ضابطہ گورنمنٹ سکولوں میں ہے۔  
 ایک سال کی خدمات کے لئے 02، دو سال کی خدمات کے لئے 03، تین سال یا اس سے زیادہ کی خدمات کے لئے 05 اضافی نمرے دیئے جائیں گے۔

یہ اشتہار میں دی گئی نقالی پوسٹ برائے CT مردانہ اوقات پر حسب شرائط اشتہار بھرتی اور درخواست فارم تقرری کا ایک خواہش مند ہوں۔ میرے کوائف بعد میں پیش کیے جاسکتے ہیں۔

13302-0451934-0

شخصی کارڈ نمبر

تعمیراتی عالم

Tahseen  
درخواست گزار کا نام



APPLICATION FORM FOR RECRUITMENT OF TEACHER IN E & S E DEPARTMENT

District Code: \_\_\_\_\_ Roll NO: \_\_\_\_\_  
(TO BE FILLED IN BY THE OFFICE)

(TO BE FILLED IN BY THE CANDIDATE)

TYPE OF TEST APPLIED FOR: TAT-1  TAT-2   
(Tick relevant box)

1. NAME (CAPITAL LETTERS) TAHSEEN ALAM
2. FATHER'S NAME (CAPITAL LETTERS) SHAH ALAM KHAN
3. GENDER:  MALE  FEMALE
4. DATE OF BIRTH: 30-03-1968
5. CNIC NO. 133020451934-0
6. DOMICILE (District) HARIPUR
7. PERMANENT ADDRESS NCOR COLONY, MOHALLAH: AZIZABAD  
KACHI ROAD, TEHSIL AND DIST HARIPUR
8. ADDRESS FOR CORRESPONDANCE AS ABOVE
9. CONTACT NO 0334-5427940
10. NAME OF OFFICER ATTESTING THE PHOTO: TAHIRA NAZ
11. Bank Draft No. <sup>APU AND</sup> 606088 Date 25/05/2011 Branch T-1-P Branch Haripur (0505)

C.T.G.  
Tahir Naz  
Subject Officer (I) (Secy)  
Education Deptt  
Govt. of N.W.F.F.

UNDER TAKING BY THE CANDIDATE:

I TAHSEEN ALAM ~~son of~~ SHAH ALAM KHAN do certify that I have personally filled out this form and the given information is correct to the best of my knowledge and belief.

District Officer (F)  
Education & Secy: Education  
Haripur

Tahsean  
Signature of Candidate

Initial of issuing Authority

Note:

- Application will not be entertained without Bank draft of Rs.400 to be attached with this form in original.
- Photo must be attested by 1<sup>st</sup> class Gazetted Officer



ROLL NUMBER SLIP

(TO BE FILLED IN BY THE OFFICE)

DISTRICT CODE \_\_\_\_\_

ROLL NO 00576

TYPE OF TEST APPLIED FOR: (Tick relevant box)

TAT-1  TAT-2   
PST/CT/DM/PET AI/IT/QARI

(TO BE FILLED IN BY THE CANDIDATE)

1. NAME (CAPITAL LETTERS) TAHSEEN ALAM
2. FATHER'S NAME (CAPITAL LETTERS) SHAH ALAM KHAN
3. DOMICILE (District) HARIPUR



Signature Issuing Authority /Stamp

PLEASE BRING TO THE TEST CENTER

- 1) COMPUTERIZED NATIONAL IDENTITY CARD (Original)
- 2) THIS ROLL NO. SLIP
- 3) A CLIP BOARD
- 4) BLACK THIN MARKER (Dollar Sketch Line)

PLEASE BE AT THE CENTER 45 MINUTES AHEAD OF TIME

Calculators, Calculator watches, Mobile Phones or any other electronic devices are not allowed