


20.09.2021

Nemo for the appellant. Mr. Shah Wali Ullah, ADO (Litigation) alongwith Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as her counsel and to come up for arguments before the D.B on 15.11.2021 at Camp Court Abbottabad.



(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)
CAMP COURT ABBOTTABAD

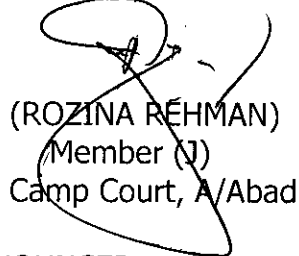


(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

15.11.2021

Counsel for the appellant and Mr. Muhammad Riaz Khan, Paindakhel, Asstt. AG for the respondents present.

Learned counsel for the appellant has requested for withdrawal of the appeal unconditionally. His signature also obtained in the margin of order sheet. Request is accorded. The appeal is dismissed as withdrawn. File be consigned to the record room.



(ROZINA REHMAN)
Member (J)
Camp Court, A/Abad



Chairman
Camp Court, A/Abad

ANNOUNCED
15.11.2021

with document
(Signature)

15.02.2021 Counsel for appellant present.

Noor Zaman Khattak learned District Attorney for respondents present.

A request for adjournment was made in order to produce all the relevant judgments delivered by the august High Court and Apex Court on the subject. Therefore, case is adjourned to 18.02.2021 before D.B at Camp Court, Abbottabad.

(Atiq ur Rehman Wazir)

Member (E)

Camp Court, A/Abad

(Rozina Rehman)

Member(J)

Camp Court, A/Abad

18.02.2021 Junior to counsel for appellant present.

Noor Zaman Khattak learned District Attorney alongwith Muhammad Siddique ADEO for respondents present.

All the relevant judgments were produced today but senior counsel is not available due to death of his relative in District Kohistan. Therefore, case is adjourned to 19.05.2021 for arguments in the light of available record, before D.B at Camp Court, Abbottabad.

(Atiq ur Rehman Wazir)

Member (E)

Camp Court, A/Abad

(Rozina Rehman)

Member(J)

Camp Court, A/Abad

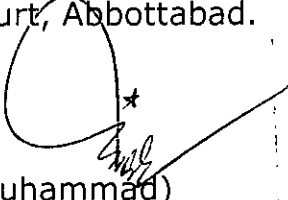
19.5.2021. Due to covid-19, the case is adjourned to 20/9/2021, as before.

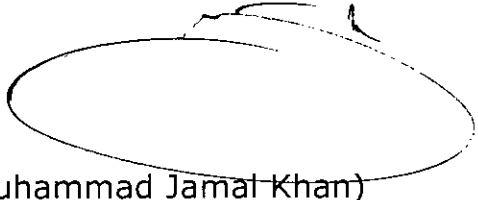
Reader

18.11.2020

Mr. Fazle Haq, Advocate for appellant is present. Mr. Riaz Ahmad Paindakheil, Assistant Advocate General and Mr. Muhammad Saddique, ADO (Litigation), for the respondents are also present.

Learned counsel for appellant requested for adjournment for the reason he is indisposed of today. Request is accepted. The appeal is adjourned to 15.02.2021 on which date file to come up for arguments before D.B at Camp Court, Abbottabad.


(Mian Muhammad)
Member (Executive)
Camp Court Abbottabad

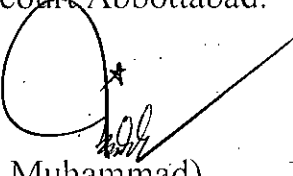

(Muhammad Jamal Khan)
Member (Judicial)
Camp Court Abbottabad

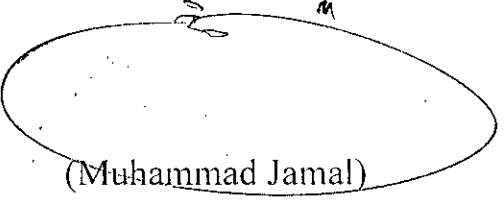
15.09.2020

No one is forth come on behalf of the appellant. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Muhammad Saddique, ADO. (Lit) for respondents present.

The bench was informed by the respective clerk of the learned counsel for the appellant Mr. Babo Fayaz, Advocate that he has proceeded to Kohistan and is not available at Abbottabad at the moment. Request for adjournment.

Adjourned to 18.11.2020 for arguments before D.B at camp court Abbottabad.


(Mian Muhammad)
Member(E)

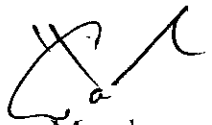

(Muhammad Jamal)
Member
Camp Court A/Abad

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20.01.2020

None for the appellant present. Mr. Muhammad Jan, DDA for respondents present. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings/arguments on 19.02.2020 before D.B at camp court Abbottabad. Appellant be put on notice for the date fixed.


Member


Member
Camp Court A/Abad

Due to covid ,19 case to come up for the same on / /
at camp court abbottabad.

Reader

Due to summer vacation, case to come up for the same on
15 19 20 at camp court abbottabad.


Reader

18.09.2019

Learned counsel for the appellant present. Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith Mr. Muhammad Saddique, ADO for official respondents No. 1 to 3 present and submitted para-wise comments. None present on behalf of private respondents No. 4 to 8 nor written reply on their behalf submitted therefore, fresh notices be issued to them for attendance and filing of written reply. Case to come up for written reply/comments on behalf of private respondents No. 4 to 8 on 18.11.2019 before S.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

18.11.2019

Learned counsel for the appellant present. Comments on behalf of official respondents already submitted. Neither any private respondent present nor any of them has submitted reply. The present service appeal is therefore posted for rejoinder/arguments before D.B. Adjourned to 20.01.2020 before D.B at Camp Court, Abbottabad.



Member
Camp Court, A/Abad

Service Appeal No. 174/2019

10.07.2019

Counsel for the appellant Farzana Shareef present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant is serving as Certified Teacher in Education Department. It was further contended that the Departmental Promotion Committee was constituted on 03.10.2018 for promotion of CT (BPS-15) and SCT (BPS-16) to SST (General) (BPS-16). It was further contended that the appellant is at the top of seniority list of CT as stood on 27.09.2016. It was further contended that the Departmental Promotion Committee held on 03.10.2018, has not recommended the appellant for promotion to the post of SST (BPS-16) on the ground of less qualification. It was further contended that as per rule dated 30.01.2018 promotion to the post of SST General (BPS-16) at least second class Bachelor Degree or four years B.S Degree in the relevant subject is necessary. It was further contended that since the appellant was having third division Bachelor Degree therefore, she was not recommended for promotion to the post of SST General (BPS-16) by the departmental promotion committee. It was further contended that the appellant filed departmental appeal on 18.10.2018 but the same was not responded. It was further contended that the worthy High Court has accepted the Writ Petition of a similar nature case filed by the petitioner Muhammad Baqi who was deferred by Departmental Promotion Committee on the ground of having third division in Bachelor Degree. It was further contended that on the basis of judgment of the worthy High Court, the appellant is also entitled for promotion but the Departmental Promotion Committee illegally deferred her from promotion.

The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days thereafter, notice be issued to the respondents for written reply/comments for 18.09.2019 before S.B at Camp Court Abbottabad.

Appellant Deposited
Security & Process Fee

15/7/19

(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

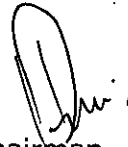
18.06.2019

Counsel for the appellant present.

In pursuance of order dated 19.04.2019 learned counsel has produced original Bachelor of Arts Degree of appellant. It was found that Division was not mentioned in the degree and for the purpose of ascertaining qualification of appellant under notification dated 30.01.2018 she had to fall back on Detailed Marks Certificate issued by University of Peshawar on 14.09.2002. On the other hand, it is clearly noted in the DMC that the candidate had passed the examination in third division.

Learned counsel when confronted with the position requested for further time to lay hand on any amendment brought about subsequently by the Elementary & Secondary Education Department in respect of requisite qualification for the post of SST(General).

Adjourned to 10.07.2019 for preliminary hearing at camp court, Abbottabad on which date the matter shall positively be argued before S.B.


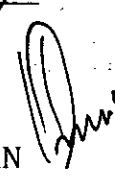



Chairman
Camp court, A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 174/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/2/2019	<p>The appeal of Mst. Farzana Shareef presented today by Mr. Fazal-ul-Haq Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 6/2/19</p>
2-	12.2.19	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>19-04-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
19.04.2019.		<p>Counsel for the appellant present.</p> <p>Learned counsel for the appellant requests for time to place on record copy of degree of graduation earned by the appellant in order to qualify for the impugned promotion. May do so before next date of hearing.</p> <p>Adjourned to 18.06.2019 before S.B at camp court, Abbottabad</p> <p style="text-align: right;"> Chairman Camp court, A/Abad</p>

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No 174 of 2018

Mst, Farzana Shareef.....**Appellant**

VERSUS

The Govt. of KPK through Secretary
Elementary and Secondary Education
Peshawar..... **Respondents**

APPEAL

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Dated 29.01.2019

Mst Farzana Shareef

(Appellant)

Through:-

FAZAL UL HAQ KHAN

ADVOCATE AT Mansehra

(Signature)

(Signature)

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No 174 of 2018 **Khyber Pakhtukhwa
Service Tribunal**

Diary No. 154

Mst. Farzana Shareef, wife of Saraj ul Wahaj, **Dated** 06-2-2019
resident of Dassu, Tehsil Dassu, District
Kohistan.....Appellant

VERSUS

- 1) The Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
- 2) Director, Elementary and Secondary Education Peshawar.
- 3) District Education Officer (Male), District Kohistan at Dassu.
- 4) Haleema Sadia, CT, at GGMS Shalkanabad, Tehsil Pallas, District Kohistan.
- 5) Saima bibi, CT, at GGMS Maidan Kolai, Tehsil Pallas, District Kohistan.
- 6) Ansar Jan, CT, at GGHS Dassu Colony, District Kohistan.

Filed to-day

Registrar

6/2/19

- 7) Tasleema Bibi, Ct, GGMS Chakai,
District Kohistan.
- 8) Saiqa Akram, CT, GGMS, Maidan
Kolai, Tehsil Pallas, District Kohistan.

.....**Respondents**

**APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT, 1974 AGAINST
THE ACT OF RESPONDENT NO 03
WHEREBY APPELLANT WAS DECLARED
NOT ELIGIBLE FOR THE PROMOTION
FROM THE POST OF CT TO THE POST OF
SST GENERAL (BPS-16) AND PRIVATE
RESPONDENTS BEING JUNIOR TO THE
APPELLANT HAVE BEEN PROMOTED AT
THE COST OF THE RIGHTS OF THE
APPELLANT.**

PRAYER:-

On acceptance of the instant service appeal, the impugned act of respondents whereby appellant has been declared as **NOT ELIGIBLE** for promotion to the post of SST (BPS-16) may graciously be set-aside and the respondents be further directed to promote the appellant to the post of SST as per seniority list.

Respectfully Sheweth:-

1. That, appellant was appointed as CT, Teacher vide appointment order dated 15.06.2004.

(Copy of appointment order is annexed as annexure "A").

2. That, respondent No 03 prepared working papers for departmental promotion committee for the promotion of CT (BPS-15) to SST General (BPS-16) wherein appellant figures on the top of the seniority list, but surprisingly, she has been declared **NOT ELIGIBLE** in the column of remarks, whereas, private respondents junior to appellant in terms of seniority having the same qualifications have been declared eligible for the promotion to the post of SST General (BPS-16).

(Copies of working papers/seniority list is annexed as annexure "B").

3. That, felling aggrieved from the impugned act of respondent no 03, appellant preferred a departmental appeal to respondent no 02 on dated 18.10.2018 which was received vide Endorsement No. 1133 dated 01.01.2019, but no order on the

representation of the appellant has so far been passed.

(Copies of departmental appeal annexed as annexure "C").

4. That, felling aggrieved, appellant having no other remedy except to file the present service appeal on the following amongst other grounds.

GROUND:-

- A) That, the qualification of the appellant is B.A with CT and as per notification No.SO (PE)4-5/SSRC/ Meeting/2012/ Teaching Cadre/2017 dated 30th January 2018 the qualification required for the promotion of SST is 2nd class bachelor degree with nine months professional training at regional institute for teacher education.

(Copy of Notification is annexed as annexure "D").

- B) That, as per seniority list, appellant is on the top of the list whereas private respondents are junior to the appellants.
- C) That, appellant despite being on top of the sonority list has been declared **NOT**

ELIGIBLE without citing any specific ineligibility and private respondents junior to appellant have been recommended for the promotion to the post of SST.

- D) That, the only criteria for the promotion in question is seniority cum fitness which criteria is fulfilled by the appellant.
- E) That, name of the appellant was initially included in the working papers but subsequently, she has been declared Ineligible.
- F) That, appellant was never put on notice to clarify to the position nor specific ineligibility has been mentioned in the working papers.
- G) That, all similarly placed teachers have been promoted to the post of SST but appellant has only been discriminated with.
- H) That, impugned act of respondent no 03 is illegal, un lawful without lawful authority and of having no legal effect.

PRAYER:-

On acceptance of the instant service appeal, the impugned act of respondents whereby appellant has been declared as **NOT ELIGIBLE** for promotion to the post

of SST (BPS-16) may graciously be set-aside and the respondents be further directed to promote the appellant to the post of SST as per seniority list.

Dated 29.01.2019

Mst. Farzana Shareef

(Appellants)

Through:-

FAZAL UL HAQ KHAN
ADVOCATE AL Manshehra

VERIFICATION :

I, Mst. Farzana Shareef, wife of Saraj ul Wahaj, resident of Dassu, Tehsil Dassu, District Kohistan do hereby solemnly affirm and declare that the contents of fore-going Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.

Mst. Farzana Shareef

BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No _____ of 2018

Mst, Farzana Shareef.....**Appellant**

VERSUS

The Govt. of KPK through Secretary
 Elementary and Secondary Education
 Peshawar..... **Respondents**

APPEAL

AFFIDAVIT

I, MST. FARZANA SHAREEF, WIFE OF SARAJ UL WAHAJ, RESIDENT OF DASSU, TEHSIL DASSU, DISTRICT KOHISTAN, DO HERBY SOLEMNLY AFFIRM AND DECLARE ON OATH THAT THE NO SUCH SUBJECT MATTER APPEAL HAS EVER BEEN FILED BEFORE THIS HONORABLE COURT NOR PENDING NOR DECIDED. THAT THE CONTENTS OF FORE-GOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

Dated: 29.01.2019

**MST FARZANA SHAREEF
 DEPONENT**



BEFORE THE SERVICE TRIBUNAL
K.P.K PESHAWAR

Service appeal No. _____ of 2018

Mst, Farzana Shareef.....**Appellant**

VERSUS

The Govt. of KPK through Secretary
Elementary and Secondary Education
Peshawar..... **Respondents**

APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANTS:

Mst. Farzana Shareef, wife of Saraj ul Wahaj,
resident of Dassu, Tehsil Dassu, District
Kohistan.

RESPONDENTS:

- 1) The Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Peshawar.
- 2) Director, Elementary and Secondary Education Peshawar.
- 3) District Education Officer (Male), District Kohistan at Dassu.
- 4) Haleema Sadia, CT, at GGMS Shalkanabad, Tehsil Pallas, District Kohistan.
- 5) Saima bibi, CT, at GGMS Maidan Kolai, Tehsil Pallas, District Kohistan.
- 6) Ansar Jan, CT, at GGHS Dassu Colony, District Kohistan.

- 7) Tasleema Bibi, Ct, GGMS Chakai,
District Kohistan.
- 8) Saiqa Akram, CT, GGMS, Maidan
Kolai, Tehsil Pallas, District Kohistan.

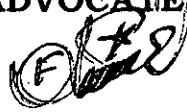
Dated 29.01.2019

Mst Farzana
(Appellant)

Through:-



FAZAL UL HAQ KHAN
ADVOCATE AT Mansehra



Mehced
11

6

OFFICE OF THE DISTRICT EDUCATION OFFICER PRIMARY KOHISTAN

Appointments

Consequent upon the interview held on 5/11/1994 and 6/11/1994 in the office of the District Education Officer Primary Kohistan, the following female candidates are hereby appointed as P.T.C. (Un-Trained) Teachers in BPS NO:-7 @ Rs, 1480/- P.M.(Fixed) plus usual allowances as admissable under the Rules with effect from the date of their taking over of charge, on the following Terms and conditions:-

<u>S/No</u>	<u>Name of Candidates</u>	<u>Father S' Name</u>	<u>Name of School</u>	<u>Rem.</u>
1	Mehmoona	Mohd Miskeen	G.G.P.S. B.Shaha	A/V.P.
2	Samina Naz	Mohd Bashir	" Dongo Gabar	"
3	Mumtaz begum	Khadi Khan	" Zedkenkhail	"
4	Iram Rehman	Fazal ur Rehman	" Lohi Dadir	"
5	Jamila Khatoon	Rasool Shah	" Zedkankhail	"
6	Sadia Sadiq	Mohd Sadiq	" Gheem Gali	"
7	Tahira Naseem	Mohd Haroon	" Gheem Gali	"
8	Sajida Bibi	Aziz ur rehman	" Bansari	"
9	Munawar Sultana	Anwar Shah	" Sargari	"
10	Bibi Amina	Haroon Khan	" Chawa Khass	"
11	Bi Bi Shehnaz Zeb	Aurang Zeb	" Chawa Khass	"
12	Farzana Bi Bi	Sharif Khan	" Palas Ser	"
13	Yasmin Kosar	Gul Rehman	" Paltan Village	"
14	Fatima Sattar	Abduusattar	" Banjar	"
15	Gul Naz	Hakim Khan	" Banjar	"
16	Nighat Perveen	Mohd Miskeen	" K.K.Abad	"
17	Ashrafi Bilal	Bilal Khan	" Maidan Kolay	"
18	Sartaj Bilal	Bilal khan	" Maidan Kolay	"
19	Safina Bibi	Badri Zaman	" Shishal	"
20	Halima Sadia	Khaista Khan	" Shishal	"
21	Samina Rehman	Abdul Rehman	" Bankad B.J.	"
22	Suriya Aziz	Aziz ur Rehman	" Bankad B.J.	"
23	Shamshad Akhtar	Malik Arfan	" Sammar Abad	"

(Continued on Page No:- 2)

11/11/94
Chief Officer

AlHested
W. A. W. A. W.

P. (12)

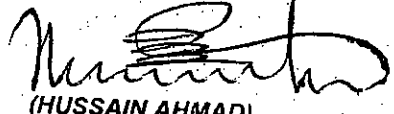
**OFFICE OF THE DISTRICT COORDINATION
OFFICER KOHISTAN AT DASSU.**

APPOINTMENT ORDER.

Consequent upon the approval of Departmental Selection Committee the competent authority is pleased to appoint Mst:Farzana Bibi D/O Sharif Khan in-service Candidate on vacant CT Post according to the Merit policy issued by the Government of NWFP Schools & Literacy Department on Regular basis on her own pay and grade in Government Girls Middle School Jalkot (Kohistan) w.e.f her date of taking over charge in the interest of public service.

CONDITIONS:-

- 1 Her appointment is purely on temporary basis and liable to termination at any time / stage with out assigning any reason/notice.
- 2 Her Certificates/Degrees if not verified earlier, should be verified by the Headmaster/Drawing & Disbursing Officer before handing over her charge.
- 3 Charge report should be submitted to all concerned.
- 4 No TA/DA is allowed.
- 5 She will be governed by such rules and regulations enforced and as prescribed by the Government from time to time for the category of the Government Servants to which she belong.
- 6 In case any of the above candidate failed to assume the charge of her post with in fifteen days, her appointment will automatically stand cancelled.


(HUSSAIN AHMAD)
District Coordination Officer
Kohistan at Dassu

Endst.No. ~~3013-20~~ Appt/CT (M) Inservice/2004 Dated Kohistan the 15/6/2004.

- 1 Copy of the above is forwarded to:-
- 2 Director Schools & Literacy NWFP Peshawar.
- 3 P/S to Minister of Education NWFP Peshawar.
- 4 P/S to Secretary Government of NWFP (S & L) Department Peshawar.
- 5 District Nazim Kohistan at Dassu.
- 6 Executive District Officer Schools & Literacy Kohistan.
- 7 District Accounts Officer Kohistan.
- 8 District Officer (M) Schools & Literacy Kohistan.
- 9-10 Head Masters/Incharges Concerned Schools.
Candidates concerned.


District Coordination Officer
Kohistan at Dassu

DPC for 03/10/2018

OFFICE OF THE DISTRICT EDUCATION OFFICER, (FEMALE) KOHISTAN.
Email, deo.female,kh@gmail.com

**Working Papers for Departmental Promotion Committee for The
Promotion of CT B-15 to Senior CT B-16.**

1	Total No. of CT Posts (Duly verified from DAO.)	38
2	1/3 Share of Senior CT Posts	12
3	Share of Promotion 100 %	12
4	Already promoted	05
5	Net to be promoted	07
6	Proposed for Promotion	03 ✓

LIST OF CT TEACHERS ELEGIBLE FOR PROMOTION SCT

Sr #	S. No	Name of Official	Present Place of posting.	Date of Birth	Qualification		Date of App; As regular CT	Whether Eligible for Up gradation	Remarks.
					Acad	Prof;			
1	2	Ansar Jan	GGHS Dassu Colony	11/8/1968	BA	CT	5/3/2013	Yes ✓	Recommended
2	4	Tasleema Bibi	GGMS Chakai	21/12/1972	BA	CT	5/3/2013	Yes ✓	Recommended
3	5	Saiqa Akram	GGMS Midan Kolai	23/3/1985	BA	CT	5/3/2013	Yes ✓	Recommended

CERTIFICATE.

1. It is certified that all the CTs (F) included in the panel for the Promotion of CT B-15 to Senior CT B-16

- Hold the posts on regular basis and none of them is holding the post on adhoc/acting charge basis/contract.
- Have completed the required minimum length of qualifying service and qualifications as required for Promotion of CT B.15 to Senior CT- B-16 under the rules.
- None of them is on deputation to any organization under the Federal/ Provincial/Autonomous/Semi autonomous/International Organizations.
- Neither any disciplinary/departmental proceedings/Anticorruption/Judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
- No one is on Long Leave/Ex-Pakistan Leave.
- Their ACRs, Synopsis are free from adverse remarks.
- They are all alive and serving.
- Their appointment orders against CT Posts are attached herewith.
- The Seniority list of B-16 Officers is final, undisputed and not subjudice.

2. The Departmental Promotion Committee is requested to determine the suitability of the above CTs for promotion of CT B-15 to Senior CT B-16 with immediate effect.

District Education Officer,
Female Kohistan.

P. 14

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT KOHISTAN.

Final Seniority list of SCT /CT Teachers as Stood on 27/09/2018

S No	Name of Teachers	Academic & Professional Qualification		Father Name	BPS	Domicile	D/O Birth	Date of First entry into Govt. Service	Date of appointment as Trained Teacher	Place of Posting	Remarks
		Acad.	Prof.								
1	Farzana Sharif	BA	CT	Muhammad Sharif	16	Kohistan	15/05/1974	11/12/1994	15/06/2004	ASDEO Circle Dassu	
2	Ansar Jan	BA ✓	CT	Muhammad Hanif	15	Rawal Pindi	11/8/1968	20/02/1988	5/3/2013	GGHS Dassu Colony ✓	
3	Halema Sadia	BA/ B-Ed	CT	Khaista Khan	15	Mansehra	18/10/1971	29/11/1994	5/3/2013	GGMS Shal Kan Abad	
4	Tasleema Bibi	BA	CT	Abdul Ghani	15	Mansehra	21/12/1972	1/11/1997	5/3/2013	GGMS Chakai	
5	Saiqa Akram	BA	CT	Muhammad Akram	15	Abbottabad	23/3/1985	8/12/2006	5/3/2013	GGMS Midan Kolai	
6	Saima Bibi	BA/ B-Ed	CT	Muhammad Manawar	15	Mansehra	4/2/1980	31/10/1997	9/3/2013	GGMS Midan Kolai	
7	Nadia Gul	MA/ B-Ed	CT	Dost Muhammad Khan	15	Mansehra	19/10/1979	21/5/2014	21/5/2014	GGMS Bela Rustam Khail	
8	Nagira Sarwar	BA	CT	Ghulam Sarwar	15	Kohistan	1/1/1988	21/5/2014	21/5/2014	GGMS Jhamra	
9	Shaheen	BA	CT	Hakeem Khan	15	Kohistan	12/2/1988	21/5/2014	21/5/2014	GGMS Shulgara	
10	Mehwish Sultan	Bsc	CT	Sultan Mehmod	15	Mansehra	22/04/1992	21/5/2014	21/5/2014	GGMS Bela Rustam Khail	
11	Shahzadi	BA	CT	Isam Khan	15	Kohistan	11/4/1991	7/3/2016	7/3/2016	GGMS Bela Dubair	
12	Rashida Nazir	MA	CT	Muhammad Nazir	15	Mansehra	7/5/1975	04/12/2009	11/8/2016	GGMS Nawaz Abad	
13	Zeenat Waii	BA	CT	Muhammad Wali Qorashe	15	Kohistan	9/5/1992	25/04/2017	25/04/2017	GGMS Ghazi Abad	
14	Ruqia	BA	CT	Bilal	15	Kohistan	21/06/1994	27/4/2017	27/4/2017	GGMS Nawaz Abad	

Certificate

Certified that:

1. The seniority list is final, undisputed and non judicious.
2. All working teachers, excluding (NTS 2018) Teachers included in the final seniority list.

Deputy District Officer
Office of Female Education
District Kohistan

DEO (F)
Distt. Kohistan

Sr #	S No
1	2
2	4
3	5

CERTIF

1.

- a. Hold the posts on regular basis and none of them is holding the posts on adhoc/acting charge basis/contract.
- b. Have completed the required qualification.

Attested
(Signature)

OFFICE OF THE DISTRICT EDUCATION OFFICER, (FEMALE) KOHISTAN.

Ph: No.0998407225 Email, deo.female,kh@gmail.com

Working Papers for Departmental Promotion Committee for The Promotion of CT -15 and Senior CT B-16 to SST General B.16.

Total No of vacant Post SST General - 06

Method of recruitment

25% initial recruitment = 1.05

75% by promotion	40 % BY PROMOTION FROM SCT/CT	2.4
	20 % BY PROMOTION FROM PHST/SPST /PST	1.2
	04 % BY PROMOTION FROM SDM /DM	0.24
	04 % BY PROMOTION FROM SAT/AT	0.24
	04 % BY PROMOTION FROM STT /TT	0.24
	03 % BY PROMOTION FROM S QARIA / QARIA	0.18
TOTAL		05

Sr #	S# No	Name of Official	Present Place of posting.	Date of Birth	Qualification		Date of App: As regular CT	Whether Eligible for Up Gradation	Remarks
					Acad	Prof.			
1	1	Farzana Sharif	ASDEO Circle Dassu	15/05/1974	BA	CT	15/06/2004	No	Not eligible Less Qualification
2	2	Ansar Jan	GGHS Dassu Colony	11/8/1968	BA	CT	05/03/2013	No	Not eligible Less Qualification
3	3	Halema Sadia	GGMS ShalKanabad	18/10/1971	BA/ B-Ed	CT	05/03/2013	Yes	Eligible
4	4	Tasleema Bibi	GGMS Chakai	21/12/1972	BA	CT	05/03/2013	No	Not eligible Less Qualification
5	5	Saiqa Akram	GGMS Midan Kolai	23/3/1985	BA	CT	05/03/2013	No	Not eligible Less Qualification
6	6	Saima Bibi	GGMS Midan Kolai	4/2/1980	BA/ B-Ed	CT	09/03/2013	Yes	Eligible

CERTIFICATE.

- It certified that all the CTs (F) included in the panel for the Promotion of CT B-15 and Senior CT B-16 to SST(G)B16
 - Hold the posts on regular basis and none of them is holding the post on adhoc-acting charge basis.
 - Have completed the required minimum length of qualifying service and qualifications as required for Promotion of CT B-15 and Senior CT B-16 to SST (G) B-16 under the rules.
 - None of them is on deputation to any organization under the Federal/ Provincial/ autonomous/Semi autonomous/International Organizations.
 - Neither any disciplinary/departmental proceedings/Anticorruption/Judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
 - No one is on Long Leave/Ex-Pakistan Leave.
 - Their ACRs, Synopsis are free from adverse remarks
 - They are all alive and serving
 - Their appointment orders against CT Posts are attached herewith.
 - The Seniority list of B-16 Officers is final, undisputed and not subjudice
- The Departmental Promotion Committee is requested to determine the suitability of the above CTs for promotion of CT B-15 to Senior SCT B-16 with immediate effect.

(Signature)
District Education Officer,
(Female)Kohistan.

E) DIS
n 27/09

Date of
pointment as
Trained
Teacher

06/2004

2013

2013

2013

2013

2013

5/2014

5/2014

5/2014

5/2014

5/2014

2016

8/2016

04/2017

4/2017

(Signature)
District
Officer

*27.03.2018 is hereby
recommended after promotion
CT to SST*

(Signature)

Approved

P 16

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT KOHISTAN.

Final Seniority list of SCT /CT Teachers as Stood on 27/09/2018

S No	Name of Teachers	Academic & Professional Qualification		Father Name	BPS	Domicile	D/O Birth	Date of First entry into Govt. Service	Date of appointment as Trained Teacher	Place of Posting	Remarks
		Acad.	Prof.								
1	Farzana Sharif	BA	CT	Muhammad Sharif	16	Kohistan	15/05/1974	1/12/1994	15/06/2004	ASDEO Circle Dassu	
2	Ansar Jan	BA	CT	Muhammad Hanif	15	Rawal Pindi	11/8/1968	20/02/1988	5/3/2013	GGHS Dassu Colony	
3	Halema Sadia	BA/ B-Ed	CT	Khaista Khan	15	Mansehra	18/10/1971	29/11/1994	5/3/2013	GGMS Shal Kan Abad	
4	Tasleema Bibi	BA	CT	Abdul Ghani	15	Mansehra	21/12/1972	1/11/1997	5/3/2013	GGMS Chakai	
5	Saiqa Akram	BA	CT	Muhammad Akram	15	Abbottabad	23/3/1985	8/12/2006	5/3/2013	GGMS Midan Kolai	
6	Saima Bibi	BA/ B-Ed	CT	Muhammad Manawar	15	Mansehra	4/2/1980	31/10/1997	9/3/2013	GGMS Midan Kolai	
7	Nadia Gul	MA/ B-Ed	CT	Dost Muhammad Khan	15	Mansehra	19/10/1979	21/5/2014	21/5/2014	GGMS Bela Rustam Khail	
8	Nagina Sarwar	BA	CT	Ghulam Sarwar	15	Kohistan	1/1/1988	21/5/2014	21/5/2014	GGMS Jhamra	
9	Shaheen	BA	CT	Hakeem Khan	15	Kohistan	12/2/1988	21/5/2014	21/5/2014	GGMS Shulgara	
10	Mehwish Sultan	Bsc	CT	Sultan Mehmod	15	Mansehra	22/04/1992	21/5/2014	21/5/2014	GGMS Bela Rustam Khail	
11	Shahzadi	BA	CT	Isam Khan	15	Kohistan	11/4/1991	7/3/2016	7/3/2016	GGMS Bela Dubair	
12	Rashida Nazir	MA	CT	Muhammad Nazir	15	Mansehra	7/5/1975	04/12/2009	11/8/2016	GGMS Nawaz Abad	
13	Zeenat Wali	BA	CT	Muhammad Wali Qorashe	15	Kohistan	9/5/1992	25/04/2017	25/04/2017	GGMS Ghazi Abad	
14	Ruqia	BA	CT	Bilal	15	Kohistan	21/06/1994	27/4/2017	27/4/2017	GGMS Nawaz Abad	

Certificate

Certified that:

- The seniority list is final, undisputed and non judicious.
- All working teachers, excluding (NTS 2018) Teachers included in the final seniority list.

DAA



Office of the District Education Officer (Female) Kohistan

DEO (F) Dist. Kohistan

Sr #	S# No
1	
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CEF

- It certified that all the CT's (F) included in the panel for the Promotion of CT B-15 and Senior CT's
 - Hold the posts on regular basis and none of them is holding the post on ad.
 - Have completed the required minimum length of service.
 - None of them are ineligible.

Eligible

Conceded
17

OFFICE OF THE DISTRICT EDUCATION OFFICER, (FEMALE) KOHISTAN.

Ph: No.0998407225 Email, deo.female,kh@gmail.com

Working Papers for Departmental Promotion Committee for The Promotion of CT -15 and Senior CT B-16 to SST General B.16.

Total No of vacant Post SST General - 06

Method of recruitment
25% initial recruitment = 1.05

75% by promotion	40 % BY PROMOTION FROM SCT/CT	2.4
	20. % BY PROMOTION FROM PHST/SPST /PST	1.2
	04 % BY PROMOTION FROM SDM /DM	0.24
	04 % BY PROMOTION FROM SAT/AT	0.24
	04 % BY PROMOTION FROM STT /TT	0.24
	03 % BY PROMOTION FROM S QARIA / QARIA	0.18
TOTAL		05

Sr #	S# No	Name of Official	Present Place of posting.	Date. of Birth	Qualification		Date of App; As regular CT	Whether Eligible for Up Gradation	Remarks.
					Acad	Prof;			
1	1	Farzana Sharif	ASDEO Circle Dassu	15/05/1974	BA	CT	15/06/2004	No	Not eligible Less Qualification
2	2	Ansar Jan	GGHS Dassu Colony	11/8/1968	BA	CT	05/03/2013	No	Not eligible Less Qualification
3	3	Halema Sadia	GGMS ShalKanabad	18/10/1971	BA/ B-Ed	CT	05/03/2013	Yes	Eligible ✓
4	4	Tasleema Bibi	GGMS Chakai	21/12/1972	BA	CT	05/03/2013	No	Not eligible Less Qualification
5	5	Saiqa Akram	GGMS Midan Kolai	23/3/1985	BA	CT	05/03/2013	No	Not eligible Less Qualification
6	6	Saima Bibi	GGMS Midan Kolai	4/2/1980	BA/ B-Ed	CT	09/03/2013	Yes	Eligible ✓

CERTIFICATE.

- It certified that all the CTs (F) included in the panel for the Promotion of CT B-15 and Senior CT B-16 to SST(G)B16
 - Hold the posts on regular basis and none of them is holding the post on adhoc /acting charge basis/contract.
 - Have completed the required minimum length of qualifying service and qualifications as required for Promotion of CT B.15 and Senior CT B-16 to SST (G) B-16 under the rules.
 - None of them is on deputation to any organization under the Federal/ Provincial/ autonomous/Semi autonomous/international Organizations.
 - Neither any disciplinary/departmental proceedings/Anticorruption/Judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
 - No one is on Long Leave/Ex-Pakistan Leave.
 - Their ACRs, Synopsis are free from adverse remarks
 - They are all alive and serving.
 - Their appointment orders against CT Posts are attached herewith.
 - The Seniority list of B-16 Officers is final, undisputed and not subjudice.
- The Departmental Promotion Committee is requested to determine the suitability of the above CTs for promotion of CT B-15 to Senior SCT B-16 with immediate effect.

Conceded

District Education Officer,
(Female) Kohistan.

*S# 02
Recommended
for promotion from
CT B-15 to
SST B-16 is deferred. done
to involve in enquiry.*

District Education Officer (F)
District Shaohala

R 18

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT KOHISTAN.

Final Seniority list of SCT /CT Teachers as Stood on 27/09/2018

S No	Name of Teachers	Academic & Professional Qualification		Father Name	BPS	Domicile	D/O Birth	Date of First entry into Govt. Service	Date of appointment as Trained Teacher	Place of Posting	Remarks
		Accd;	Prof;								
1	Fazana Sharif	BA	CT	Muhammad Sharif	16	Kohistan	15/05/1974	1/12/1994	15/06/2004	ASDEO Circle Dassu	
2	Ansar Jan	BA	CT	Muhammad Hanif	15	Rawal Pindi	11/8/1968	20/02/1988	5/3/2013	GGHS Dassu Colony	
3	Halema Sadia	BA/ B-Ed	CT	Khaista Khan	15	Mansehra	18/10/1971	29/11/1994	5/3/2013	GGMS Shai Kan Abad	
4	Tasleema Bibi	BA	CT	Abdul Ghani	15	Mansehra	21/12/1972	1/11/1997	5/3/2013	GGMS Chakai	
5	Saiqa Akram	BA	CT	Muhammad Akram	15	Abbottabad	23/3/1985	8/12/2006	5/3/2013	GGMS Midan Kolai	
6	Saima Bibi	BA/ B-Ed	CT	Muhammad Manawar	15	Mansehra	4/2/1980	31/10/1997	9/3/2013	GGMS Midan Kolai	
7	Nadia Gul	MA/ B-Ed	CT	Dost Muhammad Khan	15	Mansehra	19/10/1979	21/5/2014	21/5/2014	GGMS Bela Rustam Khail	
8	Nagina Sarwar	BA	CT	Ghulam Sarwar	15	Kohistan	1/1/1988	21/5/2014	21/5/2014	GGMS Jhamra	
9	Shaheen	BA	CT	Hakeem Khan	15	Kohistan	12/2/1988	21/5/2014	21/5/2014	GGMS Shulgara	
10	Mehwish Sultan	Bsc	CT	Sultan Mehmod	15	Mansehra	22/04/1992	21/5/2014	21/5/2014	GGMS Bela Rustam Khail	
11	Shahzadi	BA	CT	Isam Khan	15	Kohistan	11/4/1991	7/3/2016	7/3/2016	GGMS Bela Dubair	
12	Rashida Nazir	MA	CT	Muhammad Nazir	15	Mansehra	7/5/1975	04/12/2009	11/8/2016	GGMS Nawaz Abad	
13	Zeenat Wali	BA	CT	Muhammad Wali Qorashe	15	Kohistan	9/5/1992	25/04/2017	25/04/2017	GGMS Ghazi Abad	
14	Ruqia	BA	CT	Bilal	15	Kohistan	21/06/1994	27/4/2017	27/4/2017	GGMS Nawaz Abad	

Certificate

Certified that:

1. The seniority list is final, undisputed and non judicious.
2. All working teachers, excluding (NTS 2018) Teachers included in the final seniority list.

Office of the District Education Officer (Female) Kohistan

DEO (F)
Distt. Kohistan
27/09/2018

- (a) Hold the posts on regular basis and none of them is holding the post on adhoc /acting charge basis/contract.
- (b) Have completed the required minimum length of qualifying service and qualifications as required for Promotion of CT B.15 and Senior CT B-16 to SST (G) B-16 under the rules.
- (c) None of them is on deputation to any organization under the Federal/ Provincial/ autonomous/Semi

محکمہ آب و ہوا، ایجوکیشن ڈسٹرکٹ ایچ ایس ایچ

بوساطت ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) کوہستان

محکمہ آب و ہوا

جناب عالی! اپیل ذیل عرض ہے۔

(۱)۔ یہ کہ سالانہ سال 1994ء سے محکمہ ایجوکیشن میں اپنی بطریق احسن سرانجام دے رہی ہے اور سال

2004 میں CT ٹیچر پر پروموٹ ہو کر اب بطور ASDEO (نی میل) سرکل واسو تعینات ہے۔

(۲)۔ یہ کہ سالانہ SST پوسٹ کے لیے متعلقہ قابلیت رکھتی ہے۔ اور SST پر پروموشن کی حقدار ہے۔

(۳)۔ یہ کہ ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) کوہستان کے آفس سے جاری ہونے والی سینارٹی لسٹ میں بھی

سالانہ پہلے نمبر پر آتی ہے اور ضلع کوہستان میں دیگر تمام خواتین اساتذہ سے سینارٹی کی پہلے حقدار ہے۔

(۴)۔ یہ کہ سالانہ کو سینارٹی سے محروم رکھتے ہوئے ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) کوہستان نے سالانہ سے

جو نیئر ٹیچرز کی سینارٹی کے لیے منظوری دی ہے۔ جبکہ سالانہ کو پروموشن سے محروم کر دیا ہے۔ جو کہ

صرف اور صرف سالانہ سے رجسٹر اور بدینتی کا نتیجہ ہے۔ (نقولات سینارٹی لسٹ، تعیناتی لیٹر، تعلیمی

اسناد لف ہیں)۔

(۵)۔ یہ کہ بمطابق نوٹیفکیشن نمبری SO.(PE)4-5/SSRC/Meeting/2012/Teching

Cadre/2018 محرمہ 30th جنوری 2018ء سالانہ SST جنرل کی پوسٹ پر پروموشن کی

حقدار ہے۔ لیکن سالانہ کو محروم کر کے سالانہ کے ساتھ سرانہ انصافی کی گئی ہے۔

لہذا استدعا ہے کہ سالانہ کے بمطابق سینارٹی لسٹ SST جنرل پر پروموشن کے احکامات صادر فرمائے

جائیں۔

المرقوم 18 اکتوبر 2018ء

العارضہ

فرزانہ شریف زوجہ سراج الراج

حال تعینات ASDEO سرکل ہربن ضلع کوہستان

F



Attested
[Signature]

P. 20
Signature
D

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

NOTIFICATION

Peshawar, dated the 30th January, 2018.

No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre/2017:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department, in consultation with the Establishment Department and the Finance Department hereby directs that, in this Department's Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated 13-11-2012, the following further amendments shall be made, namely:.

AMENDMENTS

In the Appendix,-

(i) against Serial No.1, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

	3	4
SST(G)	(i) At least Second Class Bachelor's Degree or four (4) years BS Degree in the relevant subject; and	21 to 35 years";
	(ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	[Signatures]

(ii) against Serial No.1B, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

	3	4
SST (M.Phys) Pw eh :-	(i) At least Second Class Bachelor's Degree from a recognized University from the following groups with two subject on need basis.	19 to 35 years";
	(a) Chemistry, Botany or Zoology; or	[Signatures and Stamp]

Stamp: 653
20/2/18

(ix) against Serial No.22, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) Bachelor's Degree from a recognized University and Qirat Sanad from registered Institution; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years".

SECRETARY TO
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT.

Endst: of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (E&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officers (M&F) in Khyber Pakhtunkhwa. *Kohistan*
14. All District Accounts Officers in Khyber Pakhtunkhwa.
15. All Agency Education Officers/ Agency Accounts Officers in FATA.
16. PS to Governor Khyber Pakhtunkhwa. Peshawar.
17. PS to Chief Minister Khyber Pakhtunkhwa. Peshawar.
18. PS to Chief Secretary Khyber Pakhtunkhwa. Peshawar.
19. PS to Minister E&SE Khyber Pakhtunkhwa. Peshawar.
20. PS to Secretary E&SE Khyber Pakhtunkhwa. Peshawar.

AT 30.1.18
SECTION OFFICER (Primary)

s. No 0762024

Roll No. 3170

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Attested
(Signature)

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination

SESSION SUPPLEMENTARY 1990

THIS IS TO CERTIFY THAT Farzana Bibi

Son/Daughter of Sharif Khan

and a resident of Abbottabad District

has passed the *Secondary School Certificate Examination*

of the Board of Intermediate & Secondary Education, Peshawar held in October 1990

as a *Private Candidate*. He/She obtained 443 Marks out of 850.

and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|-----------------|--------------------|
| 1. English | 3. Islamiyat | 5. Gen Maths | 7. Isl: Studies |
| 2. Urdu | 4. Pakistan Studies | 6. Gen: Science | 8. Home Management |

Date of birth according to admission form is Fifteenth May,

one thousand nine hundred and Seventy Four 15-5-1974

Asstt Secretary
23rd January 1991

This certificate is issued without alteration or erasure.

Secretary

GG No 325893

P. 25

**Board of Intermediate & Secondary Education
PESHAWAR**

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination

(GENERAL GROUP)

Session 19 90 (Annual/Supplementary)

Attested
[Signature]

Name Farzana Bibi

Father's Name Shareef Khan Roll No. 3170

SUBJECT	Total number of marks allotted	MARKS OBTAINED	
		In figures	In words
1. English	150	67	/
2. Urdu	150	91	
3. Islamiyat Comp:	75	50	
4. Pakistan Studies	75	37	
5. Gen: Mathematics	100	33	
6. General Science	100	49	
7. D.S.	100	61	
8. H.M.	100	55	
Total	850	443	Four hundred & forty three

This certificate is issued errors and omissions excepted.

Prepared by AS

Checked by J

Date _____ 19 _____

Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

Attested
[Signature]
HEAD MASTER
Govt. Middle School
Jabri Mansehra

S-B 8794
PC-1

Roll No. 181382
26

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

ABBOTTABAD
N.W.F.P. PAKISTAN
PROVISIONAL CERTIFICATE

INTERMEDIATE EXAMINATION

Session 1992 Annual/Supplementary
Arts Group

THIS IS TO CERTIFY THAT Farzana Bi Bi
Son/daughter of Sharif Khan
and a candidate of Abbottabad
Registered No. 103-111111 has passed the INTERMEDIATE EXAMINATION of the
Board of Intermediate & Secondary Education Abbottabad held in December 92
as a Regular/Private candidate. He/She obtained 481 Marks out of 1100 and
has been placed in Grade (D) Representing Fair.

The Examination was taken as a whole/in parts

Prepared by A
Checked by A
Date of Preparation 24.5.93

Attested

Nazakat
Asst. Secretary (Certificates)
Asst. Secretary (Certificates)
Board of Intermediate & Secondary Education Abbottabad

HEAD MASTER
Govt. Middle School
Jabri Manshra

P. 27

**BOARD OF
INTERMEDIATE & SECONDARY EDUCATION
ABBOTTABAD**

20433 **DETAILED MARKS CERTIFICATE**

Intermediate Examination (Humanities Group)

SESSION 19 92 (Annual / Supplementary)

Name Farzana Babi

Father's Name Ghousif Khan Roll No. 1302

Attested

SUBJECTS	Subjects Marks	MARKS OBTAINED			
		Part-I	Part-II	Total in	
				Figures	Words
1. English	200			66	Four hundred eighty one
2. Urdu	200			86	
3. Islamic Education	50				
4. Pakistan Studies	50			43	
5. <u>MA</u>	200			77	
6. <u>CV</u>	200			93	
7. <u>AS</u>	200			116	
Total	1100			481	P.

Note : Errors/Omissions excepted.

Date 09/5/1992

Controller of Examinations
Board of Intermediate & Secondary Education
ABBOTTABAD

Prepared by Checked by _____

HEAD MASTER
Govt. Middle School
Jabri Manshera

P. 88

UNIVERSITY OF PESHAWAR

(PAKISTAN)



(Signature)

N^o 081946

S.No. _____

Detail Marks Certificate

B.A. Part-II Examination, 2002 (Annual)

Name Farzana Sharif

ROLL No. 81946

Father's Name Sharif Khan

Certified that the subjects offered and marks obtained by the candidate are as under: III Div

SUBJECTS	MAXIMUM MARKS	MARKS OBTAINED	
		IN FIGURES	IN WORDS
1. English	75	26	Twenty six
2. Urdu	75	25	Twenty five
3. Islamic Studies	75	31	Thirty one
4. Pakistan Studies (Compulsory)	40	13	Thirteen
B.A. Part-I Marks	285	131	one hundred thirty one
Total	550	226	Two hundred twenty six

Errors & omissions are subject to subsequent rectification.

The examination was taken as a **WHOLE / IN PARTS.**

Prepared by: *(Signature)*

(Signature)
CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

(33% passing marks required in each subject & 36% in aggregate)

14 SEP 2002

(Signature)
(Signature)
HEAD MASTER
Govt. Middle School
Jabri Mansehra

P. (29) *Shareef*

Shareef

OFFICE OF THE DISTRICT EDUCATION OFFICER DISTRICT
KOHISTAN.

TRANSFER ORDER

As per recommendation by Head Mistress GGHS Dassu Colony, The following female Secondary Teachers are hereby transferred in the school noted against each on their own grade and pay in the interest of public service with immediate effect.

S.No	Name of Teacher	Post		From		To	Remarks
1	Farzana Shareef	SCT	GGHS	Dassu Colony	GGMS	Jaikot Village	A S NO.2
2	Ansar Jan	CT	GGMS	Jaikot Village	GGHS	Dassu Colony	A S NO.1

Endst: No. 971-75 Dated Kohistan the 4/6/2013
Copy of the above is forwarded to the:-

1. District Accounts Officer Kohistan.
2. Deputy District Officer (f) ExSE Kohistan.
3. Head Mistress GGHS Dassu Colony
4. ADO Circle Concerned.
5. All Candidates Concerned.

[Signature]
District Education Officer
(F) District Kohistan

[Signature]
District Education Officer
(F) District Kohistan

[Signature]
HEAD MASTER
Govt: Middle School
Jabri Manshra

EDUCATION DEPARTMENT; N.-W.F.P., PESHAWAR,



CERTIFICATE OF TEACHING.

ROLL NO..... 893
 Certified that..... Farzana Bibi
 born on..... 15-5-1974 (Fifteenth May Nineteen hundred and Seventy Four.....)
 Son/Daughter of..... Sharif Khan
 resident of..... Sarbana Tehsil..... Abbottabad District..... Abbottabad
 having passed the Certificate of Teaching Examination held in 19⁹⁶, is qualified to teach in the Middle
 Department of an Angle-Vernacular School.
 Trained at the Government Training School, Edu; Ext; Services Abbottabad

Handwritten: dHes ted
(Signature)

(Signature)
 HEAD MASTER
 Govt. Middle School
 Jabri Manshra

Dated Peshawar,
 13-5-19 97

(Signature)

(Signature)
 Registrar,
 Departmental Examinations,
 Education Department, Peshawar.

(Signature) *(Signature)*

(Handwritten in circle): 30

DOMICILE CERTIFICATE.

R(31)

Attested
(Signature)



I declare that I was born of parents who are permanently domiciled in N.W.F.P. having belonged to it by birth/ settled in it.
I belong by birth to Village/ Mahallah _____

Tehsil Dassu District Kohistan Village _____

Signature of applicant
Dated (Signature)

Assurance to the declaration dated _____ filed by _____

Mr. Farzana Bibi Son/Daughter of Sherif Khan w/o Sher Ahmad

Domiciled in the NWFP, it is hereby certified that the said Mr. Farzana Bibi is born of parents who are permanent residents of the NWFP, having belonged to it by birth/ settling in it.

I have satisfied myself from personal/ knowledge/ verification that above declaration is true and certify.

This 8th day of October 2002.

No. 199 /DOR(Dassu) Dated Dassu the 8/10/20

(Signature)
DEPUTY DISTRICT OFFICER
REVENUE & ESTATE
Office Revenue & Estate
DASSU.

COUNTERSIGNING

(Signature)
District Officer
REVENUE & ESTATE
KOHISTAN.

No. 370 /DOR(KH)
Dated Dassu the 8/10/2002.

(32)

بیان ملک زریغہ خان ناظم عام کورٹ کارپوریشن - سکس فضل ہی ٹریل کونسل کے لیے کورٹ کارپوریشن

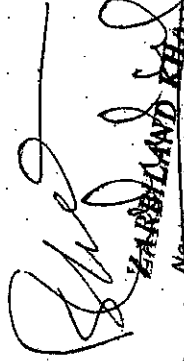
تقریبی بیانات کے لیے کہ سماء فریڈا جی ڈی دفتر شریف خان نوح سیر احمد

قوم سمیت ضلع سکس کارپوریشن پورٹ کولنگ کورٹ کارپوریشن تحصیل دانو ضلع کورٹ

کی مستقل ماہیگرہ ہے۔ ڈیوٹی سٹیشن سٹیشن ڈیپارٹمنٹ ڈیپارٹمنٹ

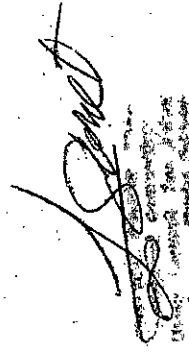
سین کورڈسٹ نیکو

تقریبی


HARBILAL KHAT

Naam Uo Kuz Jalko
Dilip Singh
Khat
Khat
Khat

126-70-505757



تقریبی بریل و نل کو جی

مناجی!

شرکتہ فی ملک زریغہ خان لکھنؤ کونسل کورٹ کارپوریشن سکس فضل ہی ٹریل کونسل کے لیے کورٹ کارپوریشن

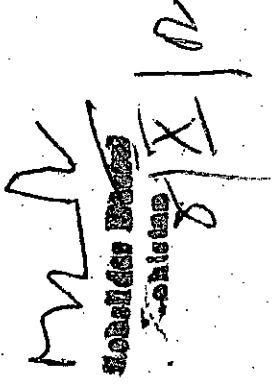
مقامہ ٹریڈنگ جی ڈی دفتر شریف خان نوح سیر احمد ضلع کورٹ

کارپوریشن دانو ضلع کورٹ کی مستقل ماہیگرہ لکھنؤ جی ڈی ٹریڈنگ جی ڈی

Subscribed

F-1C90 21X102

Verified as above


Mulla
Notary Public
F-1C90 21X102

Attested
(Signature)

P. 31-A

31-A



(Signature)

دستخط مال کارڈ

حکومت پاکستان

قومی شناختی کارڈ

13101-7260133-8

نام: فرزانہ شریف

جنس: عورت

شہر کا نام: سمران الہ آباد

شناختی عہدہ: ٹھوس پریس

تاریخ پیدائش: 15/05/1974



عثمان یوسف مبین

دستخط مسٹر جنرل



شناختی نمبر: 13101-7260133-8

نام: فرزانہ شریف

موجودہ پتہ: فٹنر ٹاؤن، بشیر خان روڈ، محلہ اپر پشیم، ہائوس نمبر

مستقل پتہ: تاج کوٹ، کوز جاکوٹ، ڈاکھا، تحصیل تحصیل داسو، ضلع کوہستان

تاریخ اجراء: 25/02/2015

تاریخ منسوخ: 25/02/2025

گمشدہ کارڈ کے پرقریبی کینز کس میں ڈال دیں

12193140871



وکالت نامہ

33

بعدالت جناب سروس ٹریبونل خیبر پختونخواہ پشاور

مسماة فرزانه شریف

بنام

سیکرٹری محکمہ تعلیم وغیرہ

سروس اپیل

اپیلانٹ

مخانب:

باعث تحریر آنکہ!

فضل الحق ایڈووکیٹ

اندریں مقدمہ عنوان بالا اپنی طرف سے برائے بیرونی وجوہات ہی بمقام پشاور ہائی کورٹ

کو بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص زویہ و عدالت حاضر ہوتا رہوں گا اور یوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیرونی کرنے کے مجاز نہ ہونگے اگر مقدمہ مقام کچہری کے آگے یا پیچھے ساعت ہونے پر منظر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراء کے اجراء کی ڈگری و نظر ثانی، اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے کا، ہر قسم کا بیان دینے اور سپردگاری و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا فیصلہ ڈگری و اجراء ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ فیس کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرسٹر کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پرداختہ مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ 29.01.2019

فرزانه شریف زوجہ سراج الوہاب ASDEO ڈسٹرکٹ کوہستان



Attested & Accepted

Fazal Haq dvocate



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

University of Peshawar Pakistan

This certifies that

Farzana Bibi daughter of **Sharif Khan**

having fulfilled all the requirements is hereby admitted to the degree of

Bachelor of Arts

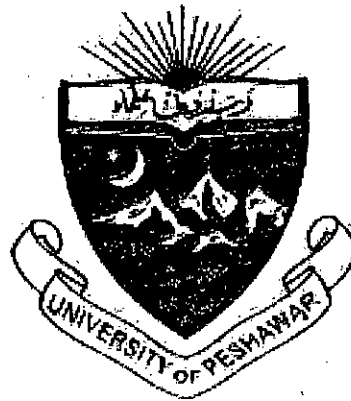
and is entitled to all the rights, honours and privileges thereunto appertaining.

Given this 14th day of September, 2002.

Roll No: 81946

Session: Annual 2002

Reg. No: 97-PS-20478



162243

Attested
2002
**DEO (F)
Kohistan**
Registrar
Vice Chancellor

BEFORE THE KYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal # 174/2019

Farzana Sharif

APPELLANT.

Versus

Govt: of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education Peshawar & others.

RESPONDENTS

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Dist. No.
46/19

**BEFORE THE HONOURABLE KYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal #174/2019

FARZANA SHARIF.....APPELLANT

VERSUS

- 1. Secretary (E&SE) Govt: of Khyber Pakhtunkhwa & others**
- 2. Director Elementary & Secondary Education KPK Peshawar**
- 3. District Education Officer (Female) Kohistan.**

RESPONDENTS

PARAWISE COMMENTS OF BEHALF OF RESPONDENT NO.1,2 & 3.

Respectfully Sheweach,

Preliminary Objections.

1. That he Appellant has neither got a cause of action nor locus standi to file the instant Appeal
2. That the Tribunal has no jurisdiction to adjudicate the matter.
3. That the appellant is treated as per rules, law and policy. Therefore the appellant is not entitled for any relief and hence appeal liable to be dismissed without further proceeding.
4. That the Appellant has concealed the material facts from this Honorable Tribunal.
5. That the appellant has been stopped by her own conduct to file the appeal.
6. That the appellant has been come to the tribunal with unclean hands.

ON FACTS.

1. Para No.1 of the appeal is pertains to appellant service record. Hence no comments.
2. Para No.2 is correct to the extent that respondent No.3 prepared working paper for departmental promotion from SCT (BPS-16) to SST (BPS-16), wherein the appellant was declared not eligible. As per policy of the

Provincial Government of Khyber Pakhtunkhwa Peshawar the required qualification for the promotion of SST is second class Bachelor Degree whereas at that time the appellant did not have the prescribed qualification. As per record she has third division bachelor degree. Therefore the junior teacher in the seniority list having second class bachelor degree declared eligible for SST General (BPS-16)

(Copy of the notification is annexed as Annexure "A")

3. Reply of Para No. 3 of the appeal is that appellant appeal has not entertained due to not having prescribed qualification.
4. Para No.4 is incorrect and denied, the appellant is not aggrieved person and was fully aware of her academic qualification. The said qualification is not prescribed one for the promotion of SST General (BPS-16).


Therefore the instant service appeal may be dismissed on the following ground.

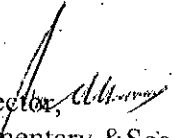
GROUND.


- a) Para (a) of Ground is Correct, further stated that at the time of preparation of working paper appellant is not having the 2nd class bachelor degree for the promotion of SST General (BPS-16) whereas as her qualification as per record is 3rd division Bachelor degree. Therefore she was declared not eligible.
- b) Para (b) of Ground is Correct. All the private respondents were treated as per law and rules. As per available rules appellant is not eligible for promotion. The respondent No.3 treated the appellant as per law and rules.
- c) Para (c) of Ground is incorrect. Appellant is not aggrieved person because all the promotion has been done on merit as per rules and law.
- d) Incorrect and denied, further stated that such criteria applies in the same cadre but not for the promotion of SST.
- e) Incorrect and denied. Detail reply has been given in above Paras.

- f) Para (f) of the ground is incorrect. There is no need to serve notice in this regard.
- g) Para (g) of the ground is correct. All the private respondents are treated as per rules and law.
- h) Para (h) of the ground is incorrect. Detail reply has already been given in above Paras.

In view of the above made submissions, this Hon'able Tribunal may very graciously be requested to dismiss the instant appeal in favor of the Respondents in the interest of equity and justice.


Secretary,
Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Deptt:
Peshawar.
(Respondent No.1)


Director,
Elementary & Secondary Education
Peshawar.
(Respondent No.2)


District Education Officer (Female)
Kohistan
(Respondent No.3)

BEFORE THE KYBER PAKHTUNKHWA SERVICE
TRIBUNAL, KPK PESHAWAR.

Service Appeal No. 174/201

Farzan Shareef

Appellant.

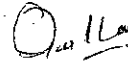
Versus

Govt: of KPK etc.:

Respondent

AFFIDAVIT

I, Mr. Muhammad Siddique, ADEO (litigation) Kohistan do hereby solemnly affirm and declare that the contents of the accompanying para wise comments are true and correct to the best of my knowledge and belief.



DEPONENT



Handwritten signature

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Handwritten notes and signatures at the top right

NOTIFICATION

Peshawar, dated the 30th January, 2018.

No.SO/PE/4-5/SSRC/Meeting/2012/Teaching Cadre/2017:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989. the Elementary and Secondary Education Department, in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notification No.SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre, dated 13-11-2012, the following further amendments shall be made, namely:

AMENDMENTS

In the Appendix:-

(i) against Serial No.1, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

<i>SST(4)</i>	3	(i) At least Second Class Bachelor's Degree or four (4) years .BS Degree in the relevant subject; and	4	21 to 35 years";
		(ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).		

Handwritten signatures and dates: A/B, S/E, 20/2/18, DED

(ii) against Serial No.1B, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

<i>SST (M.Phil) P/10 ch -</i>	3	(i) At least Second Class Bachelor's Degree from a recognized University from the following groups with two subject on need basis.	4	19 to 35 years";
		(a) Chemistry, Botany or Zoology; or		

Handwritten notes and stamps: 653, 20/2/18, 20/2/18

(Date)

P. 21

(v) against Serial No. 13, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

	3.	4.
<i>CT</i>	(i) Bachelor's Degree from a recognized University; and	19 to 35 years";
	(ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

(vi) against Serial No. 17, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

	3.	4.
<i>DM</i>	(i) Bachelor's Degree from a recognized University; and	19 to 35 years";
	(ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

(vii) against Serial No. 18, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

	3.	4.
<i>PET</i>	(i) Bachelor's Degree from a recognized University; and	19 to 35 years";
	(ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

(viii) against Serial No. 21, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

	3.	4.
<i>PST</i>	(i) Bachelor's Degree from a recognized University; and	19 to 35 years"; and
	(ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

Attested
P. 22

(b) Physics, Maths or Statistics; or (c) Humanities and other equivalent groups at degree level with English as subject; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	
--	--

(iii) against Serial No. 10. in columns No.3 and 4. for the existing entries, the following shall be substituted, namely:

3.	4.
(i) At least Second Class Master's Degree in Arabic from a recognized University; or at least Second Class Bachelor's Degree from a recognized University with Shahadatul Alamia Fil Uloomul Arabia wal Islamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat. Darul Uloom Charbagh Swat, Darul Uloom Chitral, Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by Government from time to time; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

AT

(iv) against Serial No. 11, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3.	4.
(i) At least Second Class Master's Degree in Islamiyat from a recognized University; or at least Second Class Secondary School Certificate from a recognized Board with Shahadatul Alamia from a recognized Tanzimuatul Wafaqul Madaris; or Darul Uloom Saidu Sharif Swat, Darul Uloom Charbagh Swat, Darul Uloom Chitral; Darul Uloom Darosh Chitral and any other Government run Darul Uloom, as notified by Government from time to time; and (ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	19 to 35 years";

TF

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00

(ix) against Serial No.22, in columns No.3 and 4. for the existing entries, the following shall be substituted, namely:

3	4
(i) Bachelor's Degree from a recognized University and Qirat Sanad from registered Institution; and	19 to 35 years
(ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

Gari

83

SECRETARY TO
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT.

Endst: of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (E&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officers (M&F) in Khyber Pakhtunkhwa. *Kohistan*
14. All District Accounts Officers in Khyber Pakhtunkhwa.
15. All Agency Education Officers/ Agency Accounts Officers in FATA.
16. PS to Governor Khyber Pakhtunkhwa, Peshawar.
17. PS to Chief Minister Khyber Pakhtunkhwa, Peshawar.
18. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
19. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
20. PS to Secretary E&SE Khyber Pakhtunkhwa, Peshawar.

[Signature]
SECTION OFFICER (Primary)

BEFORE THE KYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal # 174/2019

Farzana Sharif

APPELLANT.

Versus

Govt: of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education Peshawar & others.

RESPONDENTS

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Best No.
Best 46/19

**BEFORE THE HONOURABLE KYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal #174/2019

FARZANA SHARIF.....APPELLANT

VERSUS

- 1. Secretary (E&SE) Govt: of Khyber Pakhtunkhwa & others**
- 2. Director Elementary & Secondary Education KPK Peshawar**
- 3. District Education Officer (Female) Kohistan.**

RESPONDENTS

PARAWISE COMMENTS OF BEHALF OF RESPONDENT NO.1,2 & 3.

Respectfully Sheweach,

Preliminary Objections.

1. That he Appellant has neither got a cause of action nor locus standi to file the instant Appeal
2. That the Tribunal has no jurisdiction to adjudicate the matter.
3. That the appellant is treated as per rules, law and policy. Therefore the appellant is not entitled for any relief and hence appeal liable to be dismissed without further proceeding.
4. That the Appellant has concealed the material facts from this Honorable Tribunal.
5. That the appellant has been stopped by her own conduct to file the appeal.
6. That the appellant has been come to the tribunal with unclean hands.

ON FACTS.

1. Para No.1 of the appeal is pertains to appellant service record. Hence no comments.
2. Para No.2 is correct to the extent that respondent No.3 prepared working paper for departmental promotion from SCT (BPS-16) to SST (BPS-16), wherein the appellant was declared not eligible. As per policy of the

Provincial Government of Khyber Pakhtunkhwa Peshawar the required qualification for the promotion of SST is second class Bachelor Degree whereas at that time the appellant did not have the prescribed qualification. As per record she has third division bachelor degree. Therefore the junior teacher in the seniority list having second class bachelor degree declared eligible for SST General (BPS-16)

(Copy of the notification is annexed as Annexure "A")

3. Reply of Para No. 3 of the appeal is that appellant appeal has not entertained due to not having prescribed qualification.
4. Para No.4 is incorrect and denied, the appellant is not aggrieved person and was fully aware of her academic qualification. The said qualification is not prescribed one for the promotion of SST General (BPS-16).

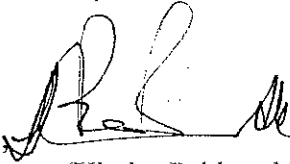
Therefore the instant service appeal may be dismissed on the following ground.

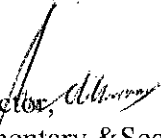
GROUND.


- a) Para (a) of Ground is Correct, further stated that at the time of preparation of working paper appellant is not having the 2nd class bachelor degree for the promotion of SST General (BPS-16) whereas as her qualification as per record is 3rd division Bachelor degree. Therefore she was declared not eligible.
- b) Para (b) of Ground is Correct. All the private respondents were treated as per law and rules. As per available rules appellant is not eligible for promotion. The respondent No.3 treated the appellant as per law and rules.
- c) Para (c) of Ground is incorrect. Appellant is not aggrieved person because all the promotion has been done on merit as per rules and law.
- d) Incorrect and denied, further stated that such criteria applies in the same cadre but not for the promotion of SST.
- e) Incorrect and denied. Detail reply has been given in above Paras.

- f) Para (f) of the ground is incorrect. There is no need to serve notice in this regard.
- g) Para (g) of the ground is correct. All the private respondents are treated as per rules and law.
- h) Para (h) of the ground is incorrect. Detail reply has already been given in above Paras.

In view of the above made submissions, this Hon'able Tribunal may very graciously be requested to dismiss the instant appeal in favor of the Respondents in the interest of equity and justice.


Secretary,
Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Deptt:
Peshawar.
(Respondent No.1)


Director,
Elementary & Secondary Education
Peshawar.
(Respondent No.2)


District Education Officer (Female)
Kohistan
(Respondent No.3)

BEFORE THE KYBER PAKHTUNKHWA SERVICE
TRIBUNAL, KPK PESHAWAR.

Service Appeal No. 174/201

Farzan Shareef

Appellant.

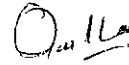
Versus

Govt: of KPK etc.:

Respondent

AFFIDAVIT

I, Mr. Muhammad Siddique, ADEO (litigation) Kohistan do hereby solemnly affirm and declare that the contents of the accompanying para wise comments are true and correct to the best of my knowledge and belief.



DEPONENT



(Handwritten signature)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

(Handwritten signature)

(Handwritten initials)

Annexure A

NOTIFICATION

Peshawar, dated the 30th January, 2018.

No.SO/PE/4-5/SSRC/Meeting/2012/Teaching Cadre/2017:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Elementary and Secondary Education Department, in consultation with the Establishment Department and the Finance Department hereby directs that in this Department's Notification No.SO/PE/4-5/SSRC/Meeting/2012/Teaching Cadre, dated 13-11-2012, the following further amendments shall be made, namely:-

AMENDMENTS

In the Appendix,-

(i) against Serial No.1, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

SST (G)

3	4
(i) At least Second Class Bachelor's Degree or four (4) years BS Degree in the relevant subject; and	21 to 35 years";
(ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

ME

S/E

(ii) against Serial No.1B, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

SST (M.Phil) PIDE

3	4
(i) At least Second Class Bachelor's Degree from a recognized University from the following groups with two subject on need basis.	19 to 35 years";
(a) Chemistry, Botany or Zoology; or	

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(v) against Serial No. 13, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

CT

3.		4.
(i)	Bachelor's Degree from a recognized University; and	19 to 35 years";
(ii)	nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

(vi) against Serial No. 17, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

DM

3.		4.
(i)	Bachelor's Degree from a recognized University; and	19 to 35 years";
(ii)	nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

(vii) against Serial No. 18, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

PET

3.		4.
(i)	Bachelor's Degree from a recognized University; and	19 to 35 years";
(ii)	nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

(viii) against Serial No. 21, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

PST

3.		4.
(i)	Bachelor's Degree from a recognized University; and	19 to 35 years"; and
(ii)	nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

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(ix) against Serial No.22, in columns No.3 and 4, for the existing entries, the following shall be substituted, namely:

3	4
(i) Bachelor's Degree from a recognized University and Qirat Sanad from registered Institution; and	19 to 35 years".
(ii) nine months in service mandatory professional training at Regional Institute for Teacher Education (RITE) or Provincial Institute for Teacher Education (PITE).	

SECRETARY TO
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT.

Endst: of even No & date:

1. The Secretary to Government of Khyber Pakhtunkhwa, Establishment and Administration Department Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Law Department Peshawar.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General Khyber Pakhtunkhwa Peshawar.
6. The Director, Elementary and Secondary Education, Khyber Pakhtunkhwa Peshawar.
7. The Director of Education (FATA) Peshawar.
8. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
9. The Director, (PITE) Khyber Pakhtunkhwa Peshawar.
10. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
11. Manager Government Printing Press Khyber Pakhtunkhwa Peshawar.
12. The Deputy Director, EMIS (E&SE) Department Khyber Pakhtunkhwa Peshawar.
13. All District Education Officers (M&F) in Khyber Pakhtunkhwa. *Kohistan*
14. All District Accounts Officers in Khyber Pakhtunkhwa.
15. All Agency Education Officers/ Agency Accounts Officers in FATA.
16. PS to Governor Khyber Pakhtunkhwa, Peshawar.
17. PS to Chief Minister Khyber Pakhtunkhwa, Peshawar.
18. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
19. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
20. PS to Secretary E&SE Khyber Pakhtunkhwa, Peshawar.

[Signature]
SECTION OFFICER (Primary)