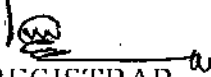


Form-A  
FORM OF ORDER SHEET

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

Restoration Application No. **114/2023**

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	28.02.2023	<p>The application for restoration of Appeal no. 1233/2022 submitted today by Mr. Amjad Hassan Tanoli Advocate. It is fixed for hearing before Division Bench at Peshawar on _____ . Original file be requisitioned. Parcha Peshi is given to appellant/counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES  
TRIBUNAL PESHAWAR**

RA No. 114/2023

Appeal No. 1233/2022

**Mst Qandeel Ayesha Waheed**

**VERSUS**

**Govt of KPK etc**

**APPLICATION FOR FIXATION OF THE CASE AT THE  
PRINCIPAL SEAT**

Respectfully Sheweth:

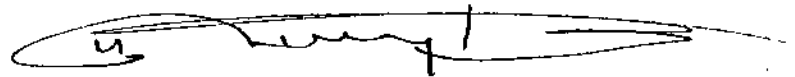
1. That the above captioned Appeal was dismissed in default vide order dated 20.02.2023 by the camp tribunal Abbottabad.
2. That the camp Tribunal Abbottabad is not functional.
3. That valuable rights of the petitioner is involve in the subject matter.

**It is, therefore, humbly prayed that on acceptance of instant Application the restoration Application may please be fixed at the Principal Seat.**

Petitioner

Through

Dated: 28.02.2023



**AMJAD HASSAN TANOLI**  
Advocate, High Court  
Peshawar

**Before The Khyber Puhtunkhwa Services  
Tribunal, Peshawar**

Appeal No: 1233/2022

RA No. 114/2023

CM NO:...../2023

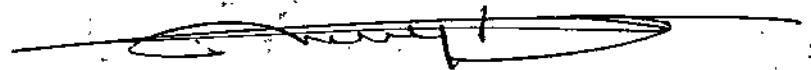
Mst. Qandeel Ayesha Waheed VS Govt of KPK & others

**INDEX**

S.No	Description of documents	Annex	Pages
1	Miscellaneous Application		1-2
2	Affidavit + Application for interim relief		3-5
3	Documents		6-12

Appellant / Petitioner

Through



Amjad Hassan Tanoli

Advocate High Court

①

**Before The Khyber Pukhtunkhwa Services  
Tribunal, Peshawar.**

Appeal No: 1233/2022  
CM NO:...../2023

RA No: 114/2023

Khyber Pukhtunkhwa  
Service Tribunal

Diary No: 3944

Dated: 28/2/23

Mst. Qandeel Ayesha Waheed VS Govt of KPK & others

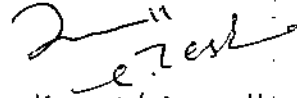
**Application for restoration of the case.**

Respectfully sheweth,

1. That the above titled case was pending adjudication before this Hon'ble court.
2. That on 20/02/2023 the captioned case was dismissed in default due to absence of the Plaintiff. (copy of attested order is attached herewith the application)
3. That the absence was neither willful nor deliberate but in fact it was due to some unavoidable circumstances as the Applicant/ Petitioner was on service training in Islamabad and counsel for the Applicant was busy at Peshawar High Court, Peshawar. (copy of the attendance schedule and Cause list are attached herewith the application)
4. That the application is well within time and there is no legal impediment exists on the acceptance of instant application.
5. That valuable rights of the plaintiff are involved in the instant case and if the case will not restore the Plaintiff will suffer irreparable loss.

2

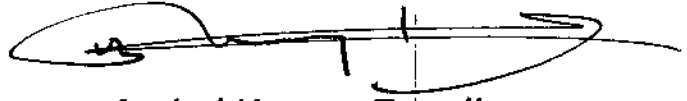
It is, therefore, humbly prayed that on acceptance of instant application, the case file may please be restored to meet the ends of justice..



Applicant/ Appellant

Through

Dated: 28/2/23



**Amjad Hassan Tanoli**

ADVOCATE, HIGH COURT PESHAWAR.

3

**Before The Khyber Puhtunkhwa Services  
Tribunal, Peshawar.**

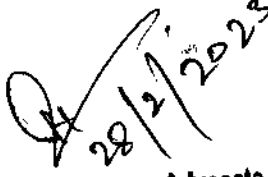
Appeal No: 1233/2022

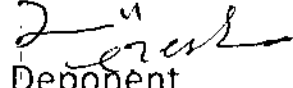
CM NO:...../2023

Mst. Qandeel Ayesha Waheed VS Govt of KPK & others

**Affidavit**

I, Qandeel Ayesha Waheed D/O Abdul Waheed Khan R/O Abbottabad do hereby solemnly affirm and declare on oath that all the contents of accompanying application are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.

  
28/2/2023  
**Humaira Rehman Advocate**  
Oath Commissioner  
Encl: Number 3370-75

  
Deponent

**BEFORE THE KHYBER PUKHTUNKHWA SERVICES**  
**TRIBUNAL, PESHAWAR**

QANDEEL AYESHA WAHEED

VS

SECRETARY EDU & OTHERS

**Application for the grant of interim relief/suspension of impugned order dated 13/5/2022 till the final disposal of the case.**

Respectfully Sheweth:

1. That the above titled appeal has been filed by the appellants along with the instant application for interim relief.
2. That the ad-interim injunction was already granted by this hon'ble Court in favour of the Petitioner.
3. That the prima facie arguable case exist in favour of petitioner/appellant, and is sanguine about his success.
4. That balance of convenience also lies in favour of petitioner/appellant.
5. That if the suspension order is not issued, the appellant will suffer an irreparable loss which will not be curable later on in any terms.

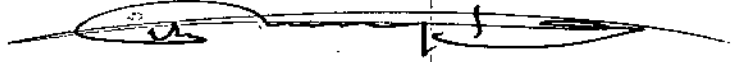
It is therefore, respectfully prayed that, on acceptance of this application, by suspending the impugned order dated 13/5/2022, temporary injunction/restraining order may please be granted against the respondents till disposal of the appeal.

5

Petitioner/appellant

Through

Dated :

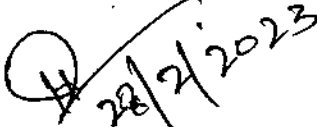


**Amjad Hassan Tanoli**

Advocate High Court, Peshawar.

**AFFIDAVIT**

I, Qandeel Ayesha Waheed D/O *Abdul Waheed leham* R/O Abbotabad, do hereby solemnly affirm and declare on oath that the contents of instant application are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.

  
**Humaira Rehman Advocate**  
**Oath Commissioner**  
**Endst: Number 3370-75**

  
**Deponent**



①      ⑥

**BEFORE THE KHYBER PUKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR**

Ref. S Appeal NO: 1233 /2022



Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1026

Dated 19-8-2022

Ms. Qandeel Ayesha Waheed, Assistant Director, DCT, Abbottabad.

.....Appellant

VS

1. Governmentt of Khyber Pukhtunkhwa through its chief secretary, civil secretariat, Peshawar.
2. The Secretary, Elementary and Secondary Education Department Civil Secretariat, Block A Opposite MPA, Hospital, Peshawar.
3. Section Officer(Female), Department of Elementary And Secondary Education, Peshawar
4. Mr. Ghulam wajid HM , Govt High School lahoor Abbottabad.

.....Respondents

Appeal u/s 4 of Service Tribunal Act 1973 against the order/ Notification Dated 13.05.2022 bearing NO.SO(S/F) E&ESD/4-16/ 2022, whereby order dated 28/4/2022 was withdrawn by the respondent No:2.

*Q. Waheed*  
*P. Zesh*

Certified to be true copy  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

7

Appeal No. 1233/2022  
Gardeel Ayesha waheed vs Govt



20<sup>th</sup> Feb, 2023

1. None present for the appellant. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present.
2. Called several times till last hours of the court but nobody turned up on behalf of the <sup>appellant</sup> ~~petitioner~~. In view of the above, the instant service appeal is dismissed in default. Consign.
3. Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal on this 20th day of February, 2023.

(Salah Ud Din)  
Member(J)

(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

**Certified to be true copy**

MEMBER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Date of Presentation of Application 21-2-2023  
 Number of ~~words~~ <sup>Page</sup> 2  
 Copying Fee 10/-  
 Urgent —  
 Total 10/-  
 Name of —  
 Date of Completion 27-2-2023  
 Date of Delivery of Copy 27-2-2023



Director

F. No. 4(4)/2021/ NCC  
Government of Pakistan  
National Curriculum Council Secretariat  
Ministry of Federal Education and Professional  
Training, Islamabad .

8

Islamabad, February 15, 2023

Subject: **INVITATION FOR 2<sup>ND</sup> INTER PROVINCIAL CURRICULUM WORKSHOP (IPCW) ON STANDARDS FOR GRADES 9-12**

The National Curriculum Council (NCC) Secretariat is steering curriculum reforms (ECE to Grade 12) with the aim of promoting quality education for all children across Pakistan. In response to a call for experts to support this consultative and comprehensive exercise, the NCC Secretariat received nominations of subject experts from multiple public, private and local non-profit organizations. We are thankful for sharing nominations from your esteemed department.

2. After successful completion of the curriculum standards for ECE-Grade 8, work on standards for Grades 9-12 has been initiated. In this regard, a series of policy-dialogues was held in sixteen different cities across Pakistan. First Inter-Provincial Curriculum Workshop (IPCW) on Standards for Grades 9-12 on November 14-17, 2022 was another milestone in this direction aimed at gathering feedback from the ground. Based on the 1st IPCW, the NCC team coordinated the development of key curricular documents for Grades 9 - 12 with the concerned subject experts.

3. **Second Inter Provincial Curriculum Workshop (IPCW) on Standards for Grade 9-12**, will take place **virtually on February 21-23, 2023**. Online meeting links for subject-wise sessions will be shared later. Participation in these sessions is on an invite-only basis. The aim of the 2<sup>nd</sup> IPCW is to introduce the curricular documents to regional stakeholders and experts and provide a way forward for a detailed regional review, feedback incorporation, and finalization. The guiding questions, schedule and session breakdown for the 2<sup>nd</sup> IPCW are attached at Annex-A.

4. Moving forward, a further series of workshops is proposed to evaluate and finalize the drafts of curricular documents for Grades 9 - 12. The concept note attached explains the overall process, gives more information on the upcoming 2<sup>nd</sup> IPCW with a detailed schedule and guiding questions, and outlines the timeline for the project under the Standards vertical (Annex-B).

5. The NCC Secretariat is looking forward to hosting provincial/area experts and engaging them for a productive session.

  
(Dr. Mariam Clughtai)

The Secretary,  
Elementary & Secondary Education Department,  
Government of the Khyber Pakhtunkhwa,  
Peshawar

Copy to:

- i) Director to Minister for Federal Education and Professional Training, Islamabad
- ii) SPS to Secretary, M/o FE&PT
- iii) SPS to Additional Secretary, M/o FE&PT
- iv) PS to Sr. Joint Secretary, M/o FE&PT
- v) Director, Directorate of Curriculum & Teacher Education, Abbottabad



**DIRECTORATE OF CURRICULUM AND TEACHER EDUCATION**

**KHYBER PAKHTUNKHWA ABBOTTABAD**

**Phone # 0992-382634 Fax # 0992-381527 (Email: director.dcte@kpsc.gov.pk)**

9

**OFFICE ORDER:**

**No.367-69/DD(A) Dated:16.02.2023** With reference to the Ministry of Federal Education and Professional Training Islamabad, National Curriculum Council Secretariat, Government of Pakistan's letter No. F. No. 4(4)/2021/NCC dated 15.02.2023, all Desk Officers of this Directorate are hereby requested to prepare SWOT analysis of National Curriculum 2006 of their concerned subjects for internal meeting to be held on 20-02-2023 at Director Office.

**DIRECTOR**

Copy forwarded for information and necessary action to:

1. Deputy Director (Admn) DCTE Khyber Pakhtunkhwa Abbottabad
2. All Desk Officers Local Directorate
3. P.S to Director, Local Directorate

  
(SYED AMJAD ALI)  
Additional Director (C&TR)

Ms Qandeel / Desk officer (Maths)

**Guiding Questions:**

- Moving toward an outcome-based education, what are some key Strengths, Weaknesses, Opportunities and Threats that persist in the curricular documents?
- What are the policy considerations underlying this work? What changes to policy would you suggest are essential for developing better quality Standards in Grades 9-12? To address implementation challenges?

**Session Breakdown - 2nd IPCW**

Details	Duration
Introduction and Team Building	20 minutes
Overview of Comparative Study, Progression Grid, Curriculum Guidelines, and Scheme of Work	20 minutes
Discussion on Scheme of Studies, SWOT Analysis and Policy Considerations	50 minutes
Discussion on Next Steps/ Closing Remarks	30 minutes
<b>Total Time per subject:</b>	<b>2 hours</b>

**Schedule - 2nd IPCW**

S. No.	Day 1: February 21st, 2023	Day 2: February 22nd, 2023	Day 3: February 23rd, 2023	Time
1	Pakistan Studies	Mathematics	Computer Science	9:00 am - 11:00 am
2	Islamiat	Urdu	English	11:00 am - 1:00 pm
3	Biology	Chemistry	Physics	2:00 pm - 4:00 pm

## **Development of Standards for Grades 9-12 through Inter-provincial Coordination**

### **Concept Note**

#### **Overview and background**

The National Curriculum Council (NCC) Secretariat is steering curriculum reforms (Early Childhood Education (ECE) to Grade 12) with the aim of promoting quality education for all children across Pakistan. In response to a call for experts to support this consultative and comprehensive exercise, the NCC Secretariat received nominations of subject experts from multiple public, private and non-profit organizations. Standards for ECE - Grade 8 have been successfully updated and notified, owing to the insight and guidance provided by numerous development and implementation experts from all provinces and areas. The NCC Secretariat is currently in the process of developing and finalizing the draft of Standards for Grades 9-12, for which NCC has engaged subject experts from across Pakistan.

#### **Engagement through Curriculum Workshops**

The ongoing curricular reforms have four components: 1) Standards, 2) Textbooks, 3) Teachers and 4) Assessments. Development of standards for Grades 9-12 comes under the Standards vertical. To ensure regional involvement and receive valuable feedback and direction on Standards for Grades 9-12, representation and ownership from provinces/areas, the NCC Secretariat is working with all regions through in-person and online engagements. The two types of curriculum workshops proposed by NCC for this purpose are detailed as follows:

#### **Inter Provincial Curriculum Workshops (IPCWs)**

- Inter Provincial Curriculum Workshops (IPCWs) are held at the Federal level, either virtually or in-person.
- Provincial/area representatives convene together and provide their input on relevant curricular content which can be related to standards, teacher and learning material, capacity building and assessment reforms.
- Representatives from provincial/area education departments, curriculum and subjects experts from the public, private and local non-profit sector may attend the IPCWs.


#### **Regional Curriculum Workshops (RCWs)**

- The NCC Secretariat recognizes that each province/region of Pakistan carries a multitude of contexts, needs, challenges and strengths. Therefore, Regional Curriculum Workshops (RCWs) are a means to further strengthen the curriculum development process by soliciting in-depth feedback and analysis.
- The RCWs are in-region workshops that are to be organized by the relevant provincial/regional body.
- These can be in-person or online.
- Representatives from the respective provincial/area education department, curriculum and subjects experts from the public, private and local non-profit sector in the region may attend the RCWs
- The RCWs can be organized based on subject, thematic area, functional area, or more.

NOTICE CASES

12

8. W.P 1031-P/2016  
(Family) With CM  
1883-  
p/2022(M)(stay  
granted on  
29/03/2016,  
Recovery of  
dower/maintenan  
e (Re-Hearing of  
HCJ) Senior  
Part)(Family-Final  
Judgment)  
(95449)
- Faisal Rehman  
V/s  
Mst. Zubaida Jabeen and other
- Adnan Khattak  
Abdul Munim Khan
9. W.P 6931-P/2019  
(Family) with  
IR(Senior  
Part)(Family-Final  
Judgment)  
(153906)
- Raheel Pasha Khan  
V/s (Date By Court)  
Mst. Farzana Khan
- Khalid Mahmood  
Niaz Wali Khan
10. Cr.M(TA) 2-  
P/2023(Criminal  
Miscellaneous-  
T.A(Criminal))  
(203943)
- Wajid Ali  
V/s (Date By Court)  
Sami Ullah and others
- Petitioner In Person  
Cr Appeal Branch AG Office
11. CM(TA) 7-  
P/2023(Criminal  
Miscellaneous-  
T.A(Civil))  
(204078)
- Sadia Ayaz  
V/s (Date By Court)  
Muhammad Suleman
- Shahin Shah (Charsadda)
12. Cr.M(BCA) 29-  
P/2022(Criminal  
Miscellaneous-Ba  
Cancellation  
Application-PPC)  
(187087)
- Malik Mano Chehar  
V/s  
Atta ur Rehman & other
- Shan Asghar  
Amir Hassan Tanoli, Cr Appeal  
Branch AG Office

قیمت 50 روپے	64493	  
ایڈوکیٹ: _____		پشاور بار ایسوسی ایشن، خیبر پختونخواہ
بار کونسل / ایسوسی ایشن نمبر: 10-7727		
رابطہ نمبر: 033.3-9481110		

بعدالت جناب: صہبہ پختونخواہ اسروس لٹریچر

Applicant / Petitioner منجانب  گورنمنٹ ایف اے ایف پی کے اے گورنمنٹ ایف اے ایف پی کے اے	Restoration Application دعویٰ علت نمبر: _____ مورخہ: _____ جرم: _____ تھانہ: _____
<b>باعث تحریر آگے</b>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام کے قرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز ذیل صاحب کو راضی نامہ کرنے و تقررات و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور سروس و دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا سناختہ پر دستخط منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کر لیں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: \_\_\_\_\_  
 28-02-2023  
 PESHAWAR BAR ASSOCIATION  
 KHYBER PAKHTUNKHWA

\_\_\_\_\_ کے لیے منظور ہے

Accepted -  
 Attested by

\_\_\_\_\_

نوٹ: اس وکالت نامہ کی فوری کاپی تاحال قبول ہوگی۔