

18.08.2015

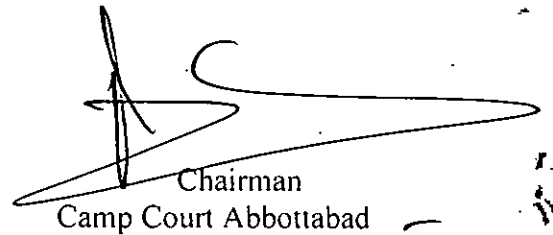
Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was considered for promotion from BPS-15 to BPS-16 by the Departmental Promotion Committee but she was ignored and Mst. Bibi Nusrat private respondent No.4 was promoted.

During the course of arguments learned counsel for the appellant informed the Tribunal that private respondent No.4 Mst. Bibi Nusrat is senior to appellant.

Since appellant was junior to private respondent No.4 and as such no vested rights of the appellant are infringed as a consequence of promotion of private respondent No.4 as such the appeal is devoid of merits and dismissed in limine. File be consigned to the record.

ANNOUNCED

18.08.2015


Chairman
Camp Court Abbottabad

18.08.15

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 849/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28.07.2015	<p>The appeal of Mst. Waheeda Syed presented today by Mr. Muhammad Arshad Khan Tanoli Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p>
2	29-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>18-8-15</u></p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. 849/2015

Mst Waheeda Syed D/O Syed Khalil Ahmed Shah, Senior TT Govt.
Girls High School Berkund, District Mansehra.

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.
4. Bibi Nusrat SST G.G.H.S Trawara District Mansehra.

.....Respondents

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1	Service Appeal along with affidavit		1-8
2	Copies of degrees	"A"	8-12
3	Copy of letter of respondent no2 dated 23.12.2013	"B"	13
4	Copies of the requisite documents for promotion as SST	"C"	14-30
5	Copy of promotion order of respondent No 4 is placed at S. No 37 of the order dated 5.11.2013	"D"	31-32
6	Copy of Departmental appeal	"E"	33-34
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Dated: *16/12* 2015

Waheed
Appellant

Through

Muhammad Arshad Khan Tanoli
Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

①

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

Appeal No. 849/2015

G.W.P. Province
Service Tribunal

Diary No. 890

Dated 28-7-2015

Mst Waheeda Syed D/O Syed Khalil Ahmed Shah, Senior TT Govt.
Girls High School Berkund, District Mansehra.

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.
4. Bibi Nusrat SST G.G.H.S Trawara District Mansehra.

.....Respondents

SERVICE APPEAL.

**Service Appeal u/s 4 of KPK Service
Tribunal, 1974**

~~_____~~
~~_____~~
28/7/15

Respectfully Sheweth,

Facts forming the back ground of the instant Service Appeal is as under:-

1. That, the appellant is serving as Senior theology teacher in GGHS, Berkund, Mansehra.

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2. That, the appellant is serving in BPS-16 with complete devotion and dedication to the entire satisfaction of her superior authorities.
3. That, the appellant as per seniority list of STT was placed at Serial No 2 for promotion to the post of SST (Senior Science Teacher General) BPS-16.
4. That, the appellant is BA, Bed and is eligible for promotion to the post of SST (BPS-16). Copies of degrees are attached as annexure "A".
5. That, respondent No 2 issued direction to respondent No 3 for submission of working papers of those STT who are eligible for promotion for SST (General) vide letter dated 23.12.2013. Copy of letter of respondent no2 dated 23.12.2013 is attached as Annexure "B".
6. That, the appellant as per order submitted her requisite documents viz. bio-date, ACR and non-involvement certificates etc to respondent No 3 for her promotion as SST. Copies of the requisite documents for promotion as SST are attached as Annexure "C".
7. That respondents' department illegally promoted respondent No 4 whose documents were not placed before the department promotion committee instead of the appellant vide impugned promotion order endst. No 8988-90291/AF-II dated 5.11.2013. Copy of promotion order of respondent No 4 is placed at S. No 37 of the order dated 5.11.2013 which is attached as Annexure "D".
8. That, the respondents' Department kept the said promotion order secret which was obtained/received by the appellant from the office of respondent No 3 on 14.11.2014.
9. That, the appellant feeling aggrieved filed departmental appeal against the impugned order to respondent No 2 on 14/1/2015 but respondents' Department did not reply to the appellant so far. Copy of Departmental appeal is attached as Annexure "E".

Hence, the appellant feeling aggrieved filed the instant appeal inter-alia on the following grounds:-

3

GROUNDS

- a. That, the appellant fulfills the criteria of promotion as SST (BPS-16) being qualified as well as the principle of seniority cum fitness. The appellant was placed at S. No 2 of the seniority list which shall be placed on record on receipt of the same from the office of respondents' department. Hence, the appellant is entitled for promotion as SST (General).

- b. That, respondent No 4 did not submit her documents before the DPC and her case was not placed by respondent NO 3 before DPC for promotion but even then she has been promoted instead of the appellant. Promotion of respondent No 4 is illegal and liable to be set aside.

- c. That, when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per law the appellant is eligible for promotion in BPS-16 as SST. The conduct of respondents towards the appellant is mala fide, discriminatory and not maintainable at law.

- d. That, this fact may not be left to fade in oblivion that respondent No 4 whose case was not placed before

4

the DPC even then she has been promoted which is against the law.

- e. That, the respondent No 4 is a blue eyed chap and has been promoted as SST by the respondents' due to political pressure and motivation. Hence, her promotion order is liable to be set aside.
- f. That, respondents' Department has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice.
- g. That, the Honourable Service Tribunal have jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribe period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal, promotion order of respondent No 4 may graciously be set aside and respondents may be directed to promote the appellant as SST (General) w.e.f. the date of promotion of her other counter part employees with all service back benefits.

Dated: 16/7/2015

Wahid Ehsan
Appellant

Through

Muhammad Arshad Khan Tanoli
Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

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BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Mst Waheeda Syed D/O Syed Khalil Ahmed Shah, Senior TT Govt.
Girls High School Berkund, District Mansehra.

.....Appellant

VERSUS

Govt. of KPK through Secretary Education (E & SE), KPK Peshawar
& 3 others.

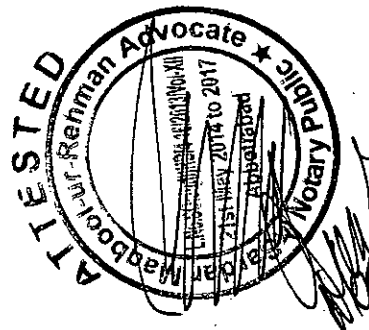
.....Respondents

AFFIDAVIT

I, Mst Waheeda Syed D/O Syed Khalil Ahmed Shah, Senior TT Govt. Girls High School Berkund, District Mansehra do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated: 16/7 /2015

Waheeda Syed
Deponent



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BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Mst Waheeda Syed D/O Syed Khalil Ahmed Shah, Senior TT Govt.
Girls High School Berkund, District Mansehra.

.....Appellant

VERSUS

Govt. of KPK through Secretary Education (E & SE), KPK Peshawar
& 3 others.

.....Respondents

Correct addresses of the parties

Respectfully Sheweth,

The Correct address of the parties are as under:-

Petitioner / Appellant

Mst Waheeda Syed D/O Syed Khalil Ahmed Shah, Senior
TT Govt. Girls High School Berkund, District Mansehra

Respondents

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

Bibi Nusrat SST G.G.H.S Trawara District Mansehra

Dated: -----/2015

Appellant

Through


Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad



BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Mst Waheeda Syed D/O Syed Khalil Ahmed Shah, Senior TT Govt.
Girls High School Berkund, District Mansehra.

.....Appellant

VERSUS

Govt. of KPK through Secretary Education (E & SE), KPK Peshawar
& 3 others.

.....Respondents

List of Books

Respectfully Sheweth,

The list of books are as under:-

1. Constitution of Islamic Republic of Pakistan, 1973
2. C S R
3. Precedent case laws

Dated: -----/2015

Appellant

Through


Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

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Annex "A"

Allama Iqbal Open University Islamabad



Serial No. 85183

REVISED

Certified that Mr. / Ms. WAHIDA SYIED

Son / Daughter of SYIED KHALIL AHMAD SHAH

Registration No: 01-NMA 0061

Roll No: P 435170

having completed the prescribed requirements in semester
Autumn 2005

is awarded the degree of:

Bachelor of Arts (General Group)

He/She has secured 59 % marks and has been placed in C grade.

CONTROLLER OF EXAMINATIONS

Result declared on: August 15, 2006

ISLAMABAD. DATED: May 24, 2008



Syed Shabbir Hussain Shah
Syed Shabbir Hussain Shah
Subject Specialist (Physics)
EPS-17

Syed Shabbir Hussain Shah
VICE-CHANCELLOR

Syed Shabbir Hussain Shah
Subject Specialist (Physics)
EPS-17

Al-Farooq Open University
Islamabad

Serial No. 9

5531



REVISED

Course Certificate

Certified that *Ms/Ms* WAHIDA SYYED
Son/Daughter of SYYED KHALIL AHMAD SHAH
Registration No. 01NMA0061 Roll No. P 435170
Semester AUTUMN 2006 has passed the course
of the BACHELOR OF ARTS programme
Title of the Course Arabic-I
Course Code 408

Marks 61% Grade B

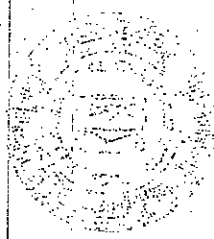
Accepted
Signature
Abdullah

Result declared on: August 24, 2007

Date of issue: September 18, 2007

Prepared by: *[Signature]*

Checked by: *[Signature]*



[Signature]
Controller of Examinations

Syed Shabbir Hussain Shah
Subject Specialist (Physics)

Note: This Certificate is issued without alteration/erasure.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



6014

Name: WAHIDA SYIED
SYIED KHALIL AHMAD SHAH
C/O SYED ZUBAIR M.A MOH ALI GOHAR KHAN
AKABAR KHAN ROAD
District: MANSEHRA
MANSEHRA
Successfully completed Bachelor of Arts (General Group)

Roll No. P 435170
Registration No. 01 NMA 0061
Final Semester Autumn 2005

REVISED

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
Spring 2004	404	Urdu	100	63
Spring 2004	435	English	100	62
Autumn 2004	416	Islamlat	100	57
Autumn 2004	417	Pakistan Studies	100	54
Autumn 2004	419	Education	100	67
Autumn 2005	407	History of Modern Muslim World	100	55
Autumn 2005	437	Islamic Studies (E)	100	62
Autumn 2005	436	Seerat-E-Tayyaba	100	51
Autumn 2005	464	Islamic Fiqh	100	64

Handwritten signature
Handwritten signature
Mohammad Arshad Khan Farooq
Advocate High Court
Islamabad

Handwritten signature
Syed Shabbir Hussain Shah
Subject Specialist (Physics)
EPS-17

Total Credits: 08

Total Marks / Obtained 900 535

Result Declared on August 15, 2006

Percentage / Grade 59 C

Date of issue April 26, 2012

Controller of Examinations

Disclaimer:
This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the result of the university student.

Allama Iqbal Open University Islamabad

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Serial No. 165002

Certified that Mr. / Ms. WAHIDA SYIED

Son / Daughter of SYIED KHALIL AHMAD SHAH

Registration No: 01NMA0061 Roll No: 608175571

having successfully completed the prescribed requirements
in semester SPRING 2011 is awarded the degree of

Bachelor of Education (B.Ed)

He / She has secured 62 % marks and has been placed in B grade.

Attested
[Signature]
Muhammad Arshad Khan (Clerk)
Advocate High Court
Islamabad

[Signature]
CONTROLLER OF EXAMINATIONS



[Signature]
Syed Shabbir Hussain Shah
Subject Specialist (Physics)
VICE-CHANCELLOR

Result declared on: January 20, 2012

Date of Issue: August 09, 2012

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

A-10401

PROVISIONAL RESULT CARD



WAHIDA SYIED

's Name SYIED KHALIL AHMAD SHAH

ress

Roll No. 608175371

Registration No. 01NM/2008

Final Semester SPRING 2011

REVISED

ehsil XXXXX

District XXXXX

has successfully completed **BACHELOR OF EDUCATION (B.ED)**

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPRING 2008	513	SCHOOL ORGANIZATION	100	55
SPRING 2008	514	EVALUATION, GUIDANCE AND RESEARCH	100	56
SPRING 2008	518	EDUCATIONAL PSYCHOLOGY	100	60
AUTUMN 2008	517	TEACHING OF PAKISTAN STUDIES	100	55
SPRING 2009	654	TEACHING OF ISLAMIAT	100	66
SPRING 2009	655	WORKSHOP AND TEACHING PRACTICE	100	86
AUTUMN 2009	512	PERSPECTIVES OF EDUCATION	100	65
AUTUMN 2009	652	ISLAM, PAKISTAN AND MODERN WORLD	100	65
SPRING 2011	651	ENGLISH	100	54

Arshad
Muhammad

Muhammad Arshad (Bye Tareh)
Advocate High Court
Abbottabad

Syed Shabbir Hussain Strach
Subject Specialist (Physics)
EPS-27

Credits: 6

Total Marks / Obtained 900 / 562

Result Declared on January 20, 2012

Percentage / Grade 62 / B

Date of issue July 16, 2012

S. I. Q.
Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Annex "C"
 (14)

BIO-DATA

1. Name WAHIDA SYED
2. Father's Name SYED KHALIL AHMAD SHAH
3. Post S.T.T. School Port Lytle High School Behr Kund (r
4. Academic Qualification B.A B.Ed
5. In case of B.Sc (Subjects) —
6. Division in BA/B.Sc 11th Grade B₁ → 2nd
7. Professional Qualification (Training received) B.Ed

Serial No	Description.	Institute	Period
1.	<u>B.Ed</u>	<u>AIOU</u>	<u>2011-2012</u>
2.	<u>—</u>	<u>—</u>	<u>—</u>

8. Date of Birth 19-06-1969

9. Date of first joining the service and the Post in which joined 27-9-1988
T.T

10. Record of Appointment:-

S.No	Post held	BPS	Whether regular/adhoc basis	Period	
				From	To
①	<u>S.T.T</u>	<u>16</u>	<u>regular</u>	<u>30-5-2013</u>	<u>update</u>
②	<u>T.T</u>	<u>15</u>	<u>regular</u>	<u>27-9-1988</u>	<u>29-5-2013</u>

11. Total service 25 years 3 months 09 days.

12. Total service on the present post S.T.T 7 years 10 months 10 days.

13. Detail of Non qualifying Service if any, —

Signature Shameen
 Headmistress
 Govt. Girls High School
 ADO / Principal / Headmaster

DY:DEO

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Sample

District Education Officer
(Male)/Female

**Working Papers for Departmental Promotion
Committees for the Promotion of SCT/CT to SST B-16**
Total No of Vacant SST (Bio Chem) posts = 100

Method of Recruitment		Total Posts
25% Initial Recruitment		
75% By Promotion	40% by promotion from S CT/CT	25
	20% by promotion from PSHT/SPST/PST	40
	4% by promotion from SDM/DM	20
	4% by promotion from SAT/AT	4
	4% by promotion from STT/TT	4
	3% by promotion from S.Qari/Qari	4
	Total	3
		100

List of CTs (Male) for the Promotion of SCT/CT to SST

S.No	S.L. No	Name of Official & Present Place of Posting	Date of Birth	Date of Appointment as Regular	Qualification	Whether eligible for Promotion	Remarks
			19/6/1969	T.T	B.A B.Ed		Attended
1		Wahida Syed GHS Behar Kund	19-6-1969		BA B.Ed	NO	Not having Basic Qualification for the post
2						Yes	

Certificate:

- It is certified that all the SCT/CTs (Male) included in the panel for the Promotion of to SST Bio-Chem post
 - 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 to the post of SST 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/Anti corruption / 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 CTs 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 SCT/CTs for Promotion to SST B-16 post with immediate effect.

الحضان
فوق العشرة
السنين
التي
تتطلبها
للمنافسة
على
الوظائف
المستقلة

District Education Officer
(Male)/Female

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BIO-DATA OF THE TEACHER

Name: WAHIDA SYED
Father's Name: SYED KHALIL AHMAD SHAH
Post Held: Senior T.T School Name: G.G.H.S Bherkund (MA)

QUALIFICATION

Academic: B.A Professional: B.Ed
In case of BSC (Subject)
Division in BA/BSC: 2nd
Professional Qualification (Training received) B.Ed

Table with 4 columns: S#, Description, Institute, Period. Row 1: B.Ed, AIOU Islamabad, 2011 to 2012.

Date of Birth: 19/16/1969 Date of first joining of service with post in which joined: 27/09/1988

Record of Appointment

Table with 5 columns: S#, Post Held, BPS, Whether Regular/ Adhoc basis, Period (From, To). Rows include T.T and S.T.T appointments.

Total Service: 31-12-2013 days (4) Month (03) Year (25)
Total Service on present Post: days (01) Month (07) Year ()
Detail of non qualifying service (if any) NIL

Signature: _____

Designation: _____

Official Seal: _____
HEAD MISTRESS
Govt Girls High School
Bherkund Mansabore.

Countersigned by E.D.O

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CONFIDENTIAL

Office of the Principal / Headmaster / Headmistress Government Higher / High / Middle

Schools: Govt. Girls High School, Bherkund (MA)

Synopsis of Character role in respect of Mr./Miss/MST: Na. Vidya Sreed

(Post): S.T.T. BPS: 16 District: Manselra

Subject: PROMOTION FROM BPS 16 TO BPS SST (C) ON THE BASIS OF SENIORITY CUM FITNESS

Date of Birth: 19 10 6 1969

Year	Nature of Report	Pen Picture / General Remarks	Whether adverse	Conversed or not	Expunged or not
2009	V. Good	punctual hardworking honest she is painstaking	NO	NA	NA
2010	V. Good	punctual teacher and true muslim	NO	NA	NA
2011	V. Good	she is meticulous well behave and effective teacher	NO	NA	NA
2012	V. Good	she is hardworking, punctual and honest teacher	NO	NA	NA
2013	V. Good	hardworking, punctual and devoted	NO	NA	NA

DO/Principal/Dy: DO/ Headmaster/Headmistress/

[Handwritten Signature]

Signature

[Handwritten Designation]

Designation

Official Seal

[Official Seal]
HEAD MISTRESS
Govt Girls High School
Bherkund Manselra

Countersigned by

Executive District Officer,
E&SE Manselra



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NON INVOLVEMENT CERTIFICATE

It is to certify that Mr/Miss/MST WAHIDA SYED D/O SYD
SYED KHALIL AHMAD SHAH (Post) S.T.T. working at
Government Middle/High/Higher Secondary Schools Bher Kund (MA) has
been serving in Education Department since 27/09/1988 up to date without any break.

It is further certified that the above mentioned teacher is no involve in any
Departmental / Judicial / Anticorruption / Police case.

Signature [Signature]
Seal HEAD MISTRESS
Govt
Dated 1/ / 2012



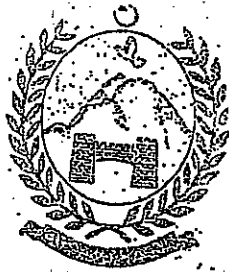
[Signature]
[Signature]

NON INVOLVEMENT CERTIFICATE

It is to certify that Mr/Miss/MST WAHIDA SYED D/O SYD
SYED KHALIL AHMAD SHAH (Post) S.T.T. working at
Government Middle/High/Higher Secondary Schools GRHS Bher Kund has
been serving in Education Department since 27/09/1988 up to date without any break.

It is further certified that the above mentioned teacher is no involve in any
Departmental / Judicial / Anticorruption / Police case.

Signature [Signature]
Seal HEAD MISTRESS
Govt Girls High School
Dated 1/ / 2012



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OFFICE OF THE PRINCIPAL / HEADMASTER/ HEADMISTRESS
GOVERNMENT HIGHER/HIGH/MIDDLE

Result of Three Years

in Respect of Mr./Miss/MST WAHIDA SYED Post S.T.T
No SD/01 SYED KHALIDA AHMAD SHAH Seniority No. 17 [31 Mar 2012]

S#	Year	Classes/ Subject	Total Number of Students	No. of Passed Students	No. of Failed Students	Result %
1	2010	9th Islam (E)	55	55	—	100%
		10th Is	35	35	—	100%
2	2011	9th (Com)	45	45	—	100%
		10th (E)	40	40	—	100%
3	2012	9th Civ	41	41	—	100%
		10th Is (Com)	35	35	—	100%

It is certified that the above mentioned information is correct as per the school record.

Reporting officer

Wahida Syed
Wahida Syed
Headmistress
Govt Girls High School
Bherkundi

Signature: _____

Designation: _____

Official Seal: _____

HEAD MISTRESS
Govt Girls High School
Bherkundi



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Serial No. in Seniority List (.....17.....) Stood on 31st March 2009

ANNUAL CONFIDENTIAL REPORT 2009

1. Name:- NAHIDA SYED
2. Father's Name:- SYED KHALIL AHMAD SHAH
3. Present Designation S.T
4. Department:- E.S.S. Education
5. Date of Birth:- 19-6-1969
6. Date of 1st Appointment: 27-9-1988
7. Academic Qualification B.A Prof: Qualification B.Ed
8. Post held during the year T.T BPS No. 10
9. Total Length of Service up to 31/12: 2009 Date of Promotion to Present Grade / Scale
10. (i.e Day 4 Month 3 Year 2009) Period of Report

Remarks on:- 4M 3 - 21

1. Judgment & Sense of Promotion Very Good
2. Initiative and drive:- V. Good
3. Technical Knowledge: V. Good
4. Supervision and control over students Commending
5. Integrity Very high
6. Co-Operation with other Staff V. Cordial
7. Relation with public V. Good
8. Knowledge of Language English, Urdu, Pashto, Hindi
9. Attitudes towards religious V. Good
10. Suitability for Promotion Most Suitable
11. Whether offer prayer regularly or not Regularly
12. Whether lives with own means of income or not Lives with own means

Handwritten signatures and stamps on the left side of the page.

Signature:.....

Name of Reporting Officer.....

Office Seal HEAD MISTRESS

Govt Girls High School
Bherkand Wana

General Remarks

She is honest, Co-operative and hard working teacher.

Signature
HEAD MISTRESS
Govt Girls High School
Bherkand Wana



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Serial No. in Seniority List (.....17.....) 31 March, 2012

ANNUAL CONFIDENTIAL REPORT , 2010

- 1. Name:- NAHIDA SYED
- 2. Father's Name:- SYED KHALIL AHMAD SHAH
- 3. Present Designation S.T.T
- 4. Department:- E.S.T Education
- 5. Date of Birth:- 19-6-1969
- 6. Date of 1st Appointment 27-9-1988
- 7. Academic Qualification B.A Prof. Qualification B.Ed
- 8. Post held during the year 2010 BPS No. 14
- 9. Total Length of Service up to 31/12/10 Date of Promotion to Present Grade / Scale
- 10. (i.e Day 06 Month 03 Year 22...) Period of Report

Remarks on:-

- 1. Judgment & Sense of Promotion V. Good
- 2. Initiative and drive:- V. Good
- 3. Technical Knowledge: V. Good
- 4. Supervision and control over students Commending
- 5. Integrity V. high
- 6. Co-Operation with other Staff Cordial
- 7. Relation with public V. Good
- 8. Knowledge of Language English, Urdu, Pashto, Hindki
- 9. Attitudes towards religious V. Good
- 10. Suitability for Promotion Most Suitable
- 11. Whether offer prayer regularly or not Regularly
- 12. Whether lives with I own means of income or not Lives with own me

Signature
Headmistress
Microfilm No. _____
Approved by _____
Abdullah

Signature:.....
Name of Reporting Officer.....

Office Seal Shan
HEAD MISTRESS
Govt Girls High School
Bherkund Wazir

General Remarks
She is honest, Co-operative and hard working teacher.

Shan
HEAD MISTRESS
Govt Girls High School
Bherkund Wazir



22

Serial No. in Seniority List (.....17.....) 31 March, 2012

ANNUAL CONFIDENTIAL REPORT 2011

- 1. Name:- WAHIDA SYED
- 2. Father's Name:- SYED KHALIL AHMAD SHAH
- 3. Present Designation E & T T
- 4. Department:- E & T Education
- 5. Date of Birth:- 19-6-1969
- 6. Date of 1st Appointment 27-9-1988
- 7. Academic Qualification B.A Prof. Qualification B.Ed
- 8. Post held during the year T.T BPS No. 15
- 9. Total Length of Service up to 31/12/11 Date of Promotion to Present Grade / Scale
- 10. (i.e Day 04 Month 03 Year 23) Period of Report

Remarks on:-

- 1. Judgment & Sense of Promotion V. Good
- 2. Initiative and drive:- V. Good
- 3. Technical Knowledge: V. Good
- 4. Supervision and control over students Commanding
- 5. Integrity Very high
- 6. Co-Operation with other Staff Cordial
- 7. Relation with public V. Good
- 8. Knowledge of Language English, Urdu, Pashto, Hindi
- 9. Attitudes towards religious V. Good
- 10. Suitability for Promotion Most Suitable
- 11. Whether offer prayer regularly or not Regularly
- 12. Whether lives with I own means of income or not Lives with own means

Altered
[Signature]

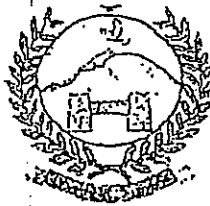
Signature.....
Name of Reporting Officer.....

Office Seal
HEAD MISTRESS
Govt Girls High School
Bherkand

General Remarks

She is honest, Co-operative and hard working teacher.

[Signature]
HEAD MISTRESS
Govt Girls High School
Bherkand



23

Serial No. in Seniority List (.....17.....) 31 March, 2012

ANNUAL CONFIDENTIAL REPORT 2012

- 1. Name:- KIAHIDA SYED
- 2. Father's Name:- SYED KHALIL AHMAD SHAH
- 3. Present Designation B.E.S.T
- 4. Department:- E & S Education
- 5. Date of Birth:- 19-6-1969
- 6. Date of 1st Appointment 27-9-1988
- 7. Academic Qualification B.A.T.T Prof: Qualification B.Ed
- 8. Post held during the year B.P.S No. 15
- 9. Total Length of Service up to 31/12/12 24 Date of Promotion to Present Grade / Scale
- 10. (i.e Day 04 Month 03 Year 24) Period of Report

Remarks on:-

- 1. Judgment & Sense of Promotion Very Good
- 2. Initiative and drive:- V. Good
- 3. Technical Knowledge: V. Good
- 4. Supervision and control over students Commanding
- 5. Integrity Very high
- 6. Co-Operation with other Staff Cordial
- 7. Relation with public V. Good
- 8. Knowledge of Language English, Urdu, Pashto, Hindi
- 9. Attitudes towards religious V. Good
- 10. Suitability for Promotion Most Suitable
- 11. Whether offer prayer regularly or not Regularly
- 12. Whether lives with I own means of income or not Lives with own mean

Handwritten signature and stamp

Signature:.....

Name of Reporting Officer.....

Office Seal

Signature
HEAD MISTRESS
Govt Girls High School
Bherkund

General Remarks

She is honest, Co-operative and hard work teacher.

Signature
HEAD MISTRESS
Govt Girls High School

BR
C
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D



24

Serial No. in Seniority List (.....17.....)

31 March 2012

2013

ANNUAL CONFIDENTIAL REPORT

- 1. Name:- KHAIDA SYED
- 2. Father's Name:- SYED KHALIL AHMAD SHAH
- 3. Present Designation S.T.T
- 4. Department:- P.S. Education
- 5. Date of Birth:- 19-6-1969
- 6. Date of 1st Appointment 27-9-1998
- 7. Academic Qualification B.A.T.T Prof: Qualification B.Ed
- 8. Post held during the year T.T BPS No. 16
- 9. Total Length of Service up to 31/12/13 13 Date of Promotion to Present Grade / Scale 16
- 10. (i.e Day 04 Month 03 Year 25 ..) Period of Report

Remarks on:-

- 1. Judgment & Sense of Promotion V. Good
- 2. Initiative and drive:- V. Good
- 3. Technical Knowledge: V. Good
- 4. Supervision and control over students Commending
- 5. Integrity V. high
- 6. Co-Operation with other Staff Cordial
- 7. Relation with public V. Good
- 8. Knowledge of Language English, Urdu, Pashto, Hindko
- 9. Attitudes towards religious V. Good
- 10. Suitability for Promotion Most suitable
- 11. Whether offer prayer regularly or not Regularly
- 12. Whether lives with I own means of income or not Lives with own means

Signature
[Handwritten signature]

Signature:.....

Name of Reporting Officer.....

[Handwritten signature]

Office Seal **HEAD MISTRESS**
Govt Girls High School
Bherkund Block

General Remarks
She is honest, cooperative and hard working teacher.

[Handwritten signature]
HEAD MISTRESS
Govt Girls High School
Bherkund Block

25
GS&PD K.P.K.

PENDIX "A"

GOVERNMENT OF PROVINCE K.P.K.

CONFIDENTIAL

حکومت صوبہ خیبر پختونخواہ

Education

(Name of the Department/Office)

Name of Service

PERFORMANCE EVALUATION REPORT

FOR THE PERIOD 1-1-2003

to 31-12-2003

PART-I

- 1. Name (in blank letters) WAHIDA SYED
- 2. Date of Birth 19-6-1969 Date of Entry into Service 27-9-1988
- 3. Grade with present pay S.T.T (R-16)
- 4. Post held during the period S.T.T
- 5. Academic Qualifications B.A B.Ed
- 6. Knowledge of language (please indicate proficiency in Speaking (S), Reading (R) and Writing (W):
English, Urdu, Pashto, Hindko
- 7. Hobbies Teaching / Studying
- 8. Training Received

Name of Course attended	Dated		Name of Institution and country
	From	To	
① B.Ed	2011	2012	AIOU Islamabad

9. Job Description (set out broadly in order of importance the main duties performed. Also mention any special work assigned during the period):-

- ⑩ Islamicat (Elective, Camp) Civics 9th, 10th, 8th
- ⑪ offers prayers five times daily
- ⑫ keeps with own means of furniture

Signature: *[Handwritten Signature]*
 Period served (S.T.T)
 (a) in present post 30-5-2013
 Date of Last annual medical check up

Signature: *Wahida Syed*
 Character

7. OVERALL GRADING IN PART-IV	<i>[Signature]</i>	work of exceptionally high quality.	<i>[Signature]</i>	work of poor quality
	<i>[Signature]</i>		<i>[Signature]</i>	

Human and Allied Professions
Advocate High Courts
Abbottabad

(27)

	AI	A	B	C	D	
8. Reliability under presence		Sh				Confused and easily flustered even under normal presence.
9. Judgment		Sh				Lacks balance consistency; Immature.
10. Financial Responsibility		Sh				Irresponsible
11. Perseverance and devotion to duty.		Sh				Negligent and disinterested.
12. Relation with: (a) Superiors (b) Colleagues (c) Subordinates		Sh				Un-cooperative; does not inspire confidence. Difficult colleague Brusque and intolerant; does not earn respect.
13. Behavior with Public		Sh				Haughty; unsympathetic and ill behaved.
OVERALL GRADING IN PART-II		Sh				

PART-IV

PROFICIENCY IN JOB

1. Power of Expression: (a) Written (b) Oral	Always precise, clear and well set out.		Sh				Clumsy and vague.
	Puts across convincingly and concisely		Sh				Ineffective.
2. Knowledge of work	Has a through grasp of the knowledge relevant to his job.		Sh				Does not know enough about the present job.
3. Analytical ability	Picks out the essentials without wasting time on irrelevant details.		Sh				Seldom sees below the surface of a problem.
4. Supervision and guidance.	Organizes and uses staff and other resources effectively.		Sh				Lacks control; in-effective.
5. ability to take decision	Very logical and decisive		Sh				Indecisive; vacillation.
6. Work: (a) output (b) Quality	Always up to date. Accumulate no arrears.		Sh				Always behind schedule; very slow disposal.
	Always produces work of exceptionally high quality.		Sh				Generally produces work of poor quality
7. OVERALL GRADING IN PART-IV			Sh				

(a) Pin-Picture: Please comment on any particularly strong or weak points within parts of the report. Also indicate the future posting considered most suitable for the

She is good & cooperative teacher.

(b) Counseling: Was the officer advised to improve vide instruction No. 4 during the period under report? If so, on what aspects and with what results?

(c) Assessment of Performance: please comment on how effective the officer has been in performing the duties mentioned at S. no: 9 in Part 1. Also comment on the officer's contribution to the overall performance of your office/organization especially in the light of any numerical measure e.g. examination result for teaching staff or other applicable index such as profitability, Project implementation, tax collection, etc. In other cases give your assessment of relative proportion of (i) routine cases (ii) complicated cases/ situations (iii) Policy cases/ crisis situation dealt with by the officer. Also indicate whether further training is required for increasing his effectiveness and if so, in which area.

(d) Inspections of subordinate officers: please indicate whether inspections were carried out regularly by the office and inspection reports were completed properly in time. Please also comment on steps taken for implementation of inspection reports and guidance provided to his subordinates.

(e) Field Tours: Please comment on interest taken by the officer in systematic and regular field tours.

Comparing him with other officers of the same level and keeping in view the overall performance in Part I, III and IV give your general assessment of the officers by initially the appropriate box below:-

(a) Overall Grading

- (i) Equaled by very few officer (very Good)
- (ii) Better than the majority of officers (Good)
- (iii) Equals the majority of officers (Average)
- (iv) Meets bare minimum standards (Below Average)
- (v) Unsatisfactory (Poor)

By Reporting Officer	By Countersigning Officer
<i>[Signature]</i>	

(b) Fitness for promotion

- (i) Fit for accelerated promotion.
- (ii) Fit for promotion ins his turn.
- (iii) Not yet fit for promotion
- (iv) Unlikely to progress further.

By Reporting Officer	By Countersigning Officer
<i>[Signature]</i>	

[Handwritten signature]

Name of the reporting officer: **SAJIDA NASREEN**
(Capital Letters)

Signature: *[Signature]*
HEAD MISTRESS
Govt Girls High School
Bherkund

Designation

Dated

PART-VII

(a) REMARKS OF THE COUNTERSIGNING OFFICER

Please report on the aspects not touched upon by the reporting officer. If you disagree with the assessment of the Reporting Officer. Please give reasons there or. You should also indicate how frequently you have seen work of the officer reported upon. If the officer has been assessed fit for promotion would you be prepared to accept him in the higher grade if no. Please give your reasons.

Name Dated.....
(Capital letters)

Designation Dated.....

(b) REMARKS OF THE SECOND COUNTERSIGNING OFFICER, (IF ANY)

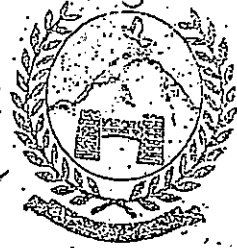
Name Dated.....
(Capital letters)

Designation Dated.....

PART-III

1. Address remarks if any communicated vide.....
Date
2. Decision on presentation, if any

(L)



29

OFFICE OF THE PRINCIPAL / HEADMASTER/ HEADMISTRESS
GOVERNMENT HIGHER/HIGH/MIDDLE

Result of Three Years

in Respect of Mr./Miss/MST WAHIDA SYED Post S.T.T
S/O D/O SYED KHALIL AHMAD Seniority No. 17

S#	Year	Classes/ Subject	Total Number of Students	No. of Passed Students	No. of Failed Students	Result %
1	2013	9th Islamiyat (Comp)	55	55	—	100%
		10th Islamiyat (E)	65	65	—	100%
2						
3						

It is certified that the above mentioned information is correct as per the school record.

Reported by
Wahida Syed
Reporting officer
Principal
G.G.H.S Bherkund
Abbottabad

Signature: [Signature]
Designation: Principal G.G.H.S Bherkund
Official Seal: _____

INSTRUCTIONS FOR FILLING UP THE ACR FORMS

30

- (i) ACR is the most important record for the assessment of an officer. At the same time the quality of ACR is a measure of the competence of the reporting officer and Countersigning Officer. It is therefore, essential that utmost care is exercised by all reporting and countersigning Officer.
- (ii) The Reporting and countersigning Officer should be
 - (a) As objective as possible and
 - (b) Clear and direct, not ambiguous or evasive in their remarks.
2. The forms are to be filed in duplicate. Part-I will be filled by the officer being reported upon and should be type written. Parts-II to VI will be filled by the reporting Officer and Part-VII by the Countersigning Officer. Both the Reporting Officer and Countersigning Officers should give their assessment of the Officer report upon in respective boxes in Part-V. The Ministry/division/Department concerned will fill Part-VIII, if any adverse remark are recorded in the report.
3. Assessment in the ACR should be confined to the work done by officer reported upon during the period covered by the report.
4. Reporting Officer is expected to counsel the officer being reporting upon about his weak points and advise him how to improve. Adverse remarks should normally be recorded when the officer fails to improve despite counseling.
5. The ACR form should be filled in an neat and tidy manner. Cuttings/Erasures should be avoided and must be initiated.
6. The ratings in Part-II, III, IV and VI should be recorded by initialing the appropriate box.
7. For uniform interpretation of qualities, etc. listed in Part-II, III and IV the two extreme shades are mentioned against each item. For example an 'Exceptionally Bright' officer with 'Excellent Comprehension' will be rated 'A' in 'Intelligence' (Box-I of Part-II). A dull and slow officer will merit a 'D' rating. A, B, & C ratings will denote shades between the above two extremes.
8. The ratings should be clear and given in one of the boxes provided for the purpose in Parts II, III, IV & V. Do not grade and officer between two shades i.e. between 'Very Good' and 'Good' or 'Good' and 'Average' or 'Average' and 'Below Average'.
9. The countersigning Officer should weigh the remarks of the Reporting Officer against his personal knowledge of the officer being reported upon, compare him with other officers of the same grade working under different Reporting Officers but under the same countersigning Officer, and then give his overall assessment in Part-VI and remarks in Part-III (a). In certain categories of cases remarks of a Second countersigning Officer also be required to be recorded. The establishment Division will identify such cases from time to time and also designate an officer as the Second Countersigning Officer for each category. The Second countersigning Officer will record his remarks in Part- VII(b).
10. If the countersigning Officer differs with the grading or remarks given (in parts other than Par-VI) by the Reporting Officer, he should score it out and give his own grading in red ink. In Part-VI he is required to give his own assessment in addition to that of the Reporting Officer.
11. The Countersigning Officer should underline, in red ink, remarks which in his opinion are adverse and should be communicated to the officer reported upon.

Arshed
Arshed

Arshed Arshed Khan
Advocate High Court
Arshed

Annex "D"

37

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

In compliance with the Notification issued by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No.3619-25/File No.2/Promotion SST B-16 dated Peshawar the 28/10/2014, the following 39 (Female) SCT/CT, SDM/DM, SAT/AT, STT/IT, PSHT, SPST/PSF and S Qaria are hereby adjusted against the post of SST (General/SST(Bio-Ch)) noted against each BPS No.16 @ 10000-800-34000 plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Government on the terms and condition given below with immediate effect and further they are being adjusted on school based.

S.#	S.L.#	Name of Officials.	Present Place of posting.	Promoted To	Date of Birth.	School Where Adjusted.
1	137	Nargis Khatoon SCT	GGHS C H Ullah	SST(Bio:Ch)	8/4/69	GGHS.SN Khan
2	144	Bibi Zainab PSHT	GGPS Mari Muqarab Shah	SST(Bio:Ch)	5/5/85	GGHS,Baidra.
3	1463	Rizwana Rafique PSHT	GGPS Chajar Bala	SST(Bio:Ch)	14/8/88	GGHS.Shinkhari
4	43	Hifat SDM	GGHSS Marad Pur	SST(Bio:Ch)	25/9/73	GGHS.Bherkund
5	1	Sabeha Begum SCT	GGHS No.1 Mansehra.	SST(Gen.)	1/1/56	Refused.
6	3	Hafiza Begum SCT	GGHS Phagla	SST(Gen.)	1/4/60	GGHS Dhanda Kholian.
7	4	Mehmooda Khanam SCT	GGHS No.1 Mansehra.	SST(Gen.)	18/7/62	Refused.
8	5	Yasmeen Begum SCT	GGHS Mangloor	SST(Gen.)	4/4/62	GGHS.Talhatta.
9	6	Gulshan Begum SCT	GGHS Dhodial	SST(Gen.)	18/4/63	Refused.
10	7	Rahat Ara SCT	GGHS Afzal Abad	SST(Gen.)	6/2/64	CGMS.Kauder.
11	11	Saeeda Bibi SCT	GGHS Shinkhari	SST(Gen.)	6/1/63	CGMS.Bali Mong.
12	12	Kishwar Naz SCT	GGHS Khwar	SST(Gen.)	10/3/66	GGHS.Jared.
13	14	Fozia Sultana SCT	GGHSS Behali.	SST(Gen.)	15/3/66	GGHS.Chanool.
14	16	Farhat Jabaeen SCT	GGHS Dharyal	SST(Gen.)	20/2/68	CGMS.Zaffer Abad.
15	18	Farhat Jabaeen SCT	GGHS No.1 Mansehra.	SST(Gen.)	12/12/68	GGHS,Kawai.
16	19	Jamila Begum SCT	GGHS Sanger	SST(Gen.)	31/3/67	Refused.
17	20	Bibi Mercena SCT	GGHS No.1 Mansehra.	SST(Gen.)	1/5/68	GGHS.Kaghan.
18	21	Samam Gul SCT	GGHS Shahelia	SST(Gen.)	15/8/69	CGMS Davel
19	21	Yasmin Akhter SCT	GGHS Shahelia	SST(Gen.)	22/12/65	CGMS Karori
20	25	Munaza Naheed SCT	GGHSS Behali.	SST(Gen.)	6/1/65	CGMS Chamial
21	27	Asia Parveen SCT	GGHS Shinkhari	SST(Gen.)	15/2/70	CGMS,Paris.
22	28	Nabeel Bano SCT	GGHS Bhatto Bandi	SST(Gen.)	5/9/68	CGMS.Chansair.
23	20	Nasreen Bibi PSHT.	GGPS Ghandian No.1	SST(Gen.)	3/2/55	GGHS Chanool.
24	44	Azra Shaheen -do-	GGPS Labor Kot	SST(Gen.)	1/6/58	GGHS,Phagal.
25	180	Kalsoom Jan -do-	GGPS Ganda	SST(Gen.)	14/3/66	CGMS.Bararkot.
26	201	Farzana Shaheen -do-	GGPS Mansehra No.1	SST(Gen.)	28/3/66	CGMS,Karkala.
27	240	Bibi Sughra -do-	GGPS Mansehra No.1	SST(Gen.)	2/6/66	GGHS.Bai Bohal.
28	279	Bibi Ghazala -do-	GGPS Hathi Mera	SST(Gen.)	25/4/68	CGMS Bai Bala
29	280	Yasmeen Usman -do-	GGPS Bagrial	SST(Gen.)	23/3/71	GGHS Dhanda Kholian.
30	281	Bibi Shaheen -do-	GGPS Bhangian	SST(Gen.)	2/2/71	CGMS,Josacha.
31	283	Gul Bibi -do-	GGPS Kotli Payeen	SST(Gen.)	8/1/70	CGMS,Kothri.
32	286	Gul Nar -do-	GGPS Khaki	SST(Gen.)	3/2/72	CGMS,Bai Bajna.
33	3	Robina Lateef.SDM	GGHS Bhatto Bandi	SST(Gen.)	12/1/69	CGMS,Karnool
34	4	Gulnaz SDM	GGHS Jabbori	SST(Gen.)	27/7/67	CGMS.Sinjee.
35	3	Shabeena Kosar SAT	GGHS Sanger	SST(Gen.)	13/2/60	GGHS Hassa.
36	5	Irum Bibi SAT	GGHS No.1 Mansehra.	SST(Gen.)	3/10/69	GGHS,Mong.
37	1	Bibi Nusrat STT	GGHS Tarwara	SST(Gen.)	6/7/59	CGMS.Trawara.
38	2	Shaheen Jalil STT	GGHS Dhodial	SST(Gen.)	4/5/62	CGMS,Bela Sacha
39	3	Abida Sultana S Qaria	GGHS Gandian.	SST(Gen.)	1/4/66	CGMS Shangrata

Terms and Conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.

Attested

[Signature]

[Signature]

Stamp: DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their Inter Se-seniority on lower post will remain intact.
6. NO.TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment made to him in light this order will be recovered and if she is wrongly promoted she will be reversed.
8. They will be governed by such rules and regulations as may be issued from time to time by the Govt;
9. Their posting will be made on school based, they will have to serve at the place of posting, and their service is not transferable to any other station.
10. Before handing over charge once again their documents may be checked if they have not the required relevant Qualifications as per rules. they may not be handed over charge of the post.

32

Sd/-
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Endst: No. 8988-9029 / AE-II/Prom: SST (Sc: /Gen:). Dated 05/11 /2014

Copy to the:-

1. PA to Director (E&SE) Khyber-Pakhtunkhwa Peshawar.
2. District Accounts Officer Mansehra.
3. Principals/Headmistress Concerned.
4. ADO B&AO Local Office.
5. Accountant Concerned Local Office.
6. Teacher Concerned.
7. DMO Mansehra.
8. DC Mansehra.

Mazhar

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Mustafa
M. Mustafa
Principal, High School
Mansehra

Through Proper Channel

جناب عالی! اپیل گزارشات عرض ذیل پیش ہیں۔

- ۱۔ یہ کہ سالکہ 1988ء سے محکمہ تعلیم میں تھیا لوجی ٹیچر / سینئر تھیا لوجی ٹیچر سے فرائض منصبی سرانجام دے رہی ہے
- ۲۔ یہ کہ سالکہ تعلیمی کوٹے کے تحت S.T.T (G) گریڈ 16 سے S.S.T (G) گریڈ 16 کیلئے پروموشن متوقع تھی اور میرٹ / انسٹیٹیوٹ لسٹ میں بھی دوسرے نمبر پر تھی اور اس پر مئی 2014ء میں DPC ہو چکی تھی S.S.T (G) کی حقدار تھی لیکن نامعلوم وجوہات سے سالکہ کو اس حق سے محروم کر دیا اس لیے سالکہ انصاف کی طلب کیا ہے۔
- ۳۔ یہ کہ DPC مئی 2014ء میں صلاح الدین شاہ صاحب پرنسپل گورنمنٹ ہائی سکول نمبر 14 بیٹ آباد نے ڈائریکٹر ایجوکیشن پشاور کی ہدایت پر کی گئی۔
- ۴۔ یہ کہ اس کیڈر کی بی بی نصرت نے نہ ہی مقررہ تاریخ پر کاغذات جمع کیے اور نہ ہی مئی 2014ء DPC میں موجود تھی بعد میں ملی بھگت سے کاغذات جمع کیے جو کہ غیر قانونی ہیں یہ کاروائی سالکہ کو S.S.T (G) سے محروم کرنے کی سازش ہے اور بد نتیجی پر مبنی ہے۔

۵۔ یہ کہ سالکہ اعلیٰ کوالیفیکیشن ہے جو کہ S.S.T (G) گریڈ 16 کی حقدار ہے۔

۶۔ یہ کہ سالکہ اعلیٰ کوالیفیکیشن ہونے کی وجہ سے S.S.T (G) سے محروم کرنا نا انصافی ہے۔

- | | |
|-----------------|------------|
| ۱۔ بی۔ اے | فرسٹ ڈویژن |
| ۲۔ بی ایڈ | فرسٹ ڈویژن |
| ۳۔ ایم ایڈ | فرسٹ ڈویژن |
| ۴۔ شہادتہ عامہ | |
| ۵۔ شہادتہ خاصہ | |
| ۶۔ شہادتہ عالیہ | |
| ۷۔ مولوی فاضل | |

Handwritten signature and stamp of the Director of Education, Peshawar.

۷۔ یہ کہ سالکہ میٹرک تک کلاسز پڑھاتی ہے S.S.T (G) گریڈ 16 کی پوسٹ کی حقدار ہے۔

۸۔ یہ کہ سالکہ گریڈ 16 سینئر تھیا لوجی ٹیچر ہے اس لیے اس پوسٹ گریڈ 16 S.S.T (G) سے محکمہ کو کوئی مالی نقصان نہیں ہے۔

۹۔ یہ کہ سالکہ نے کاغذات بروقت جمع کیے اور انسٹیٹیوٹ کی کمیٹی پر بھی پوزیشن ہے اور پوسٹ کی حقدار ہے۔

لہذا استدعا ہے کہ سالکہ کو S.T.T گریڈ 16 سے S.S.T (G) گریڈ 16 کا آرڈر صادر کیا جائے تاکہ انصاف ہو سکے۔

اراضی

محمدہ سید سنیر تھیا لوجی ٹیچر گریڈ 16 گورنمنٹ گریڈ ہائی سکول بھیر کنڈ مانسہرہ

P.T.O

المترق 9/12/2014

کاپی برائے۔

۱۔ سیکرٹری ایجوکیشن خیبر پختونخواہ پشاور



No. 656 dated 9/12/2014

Forwarded in original to DEO (F) Mansehra for necessary action please.

Handwritten signature
Principal
G.G.H.S Bherkund
09-12-014

No 421/PP-2(A) / Dated 13/4/2015 2015

~~Forwarded & submitted in~~
original to the Director Elementary
& Secondary Education Khyber Pakhtunkhwa
Peshawar for further n/a please.

Handwritten signature
District Education Officer
(Female) Mansehra

بعدالت جناب سروس ٹریڈنگ کمپنی لہور

عنوان: وحیدہ سید نام حکومت پنجاب لاہور

منجانب: Appellant

نوعیت مقدمہ: بیروشن

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے بیروی وجواب دہی کل کارروائی متعلقہ آل مقام

محمد شہزاد تنویر سید کہہ جانی کورٹ

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

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

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

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

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

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

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

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

مقدمہ کی بیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصینہ مفلسی کے دائرہ کرنے اور اس کی

بیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

الرقوم: 27/6/2015

Accepted

محمد شہزاد تنویر سید
Muhammad Arshad Khan Tanzeel
Advocate High Court
Lahore

Wahid Saeed
Wahid Saeed