


This is an appeal filed by Mst. Afsheen Mumtaz today on 10/01/2022 against the seniority list dated 02-03-2021 against which she preferred/made departmental appeal/representation on 01-11-2021 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority report as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

1. Index of the appeal may be prepared according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
2. Memorandum of appeal may be got signed by the appellant.
3. Affidavit may be attested by the Oath Commissioner.
4. Appeal has not been flagged/ marked with annexures marks.
5. Annexures of the appeal may be attested.
6. Address of respondent no. 3 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
7. Annexures-D, F and I of the appeal are missing.
8. Copy of covering letter dated 04.7.2017 mentioned in para-8 of the memo of appeal is not attached with the appeal which may be placed on it.
9. Copy of notification bearing no. SO(S/F)E&SE/4-24/2021 dated 26.10.2021 against which appellant made departmental appeal on 29.10.2021 is not attached with the appeal which may be placed on it.
10. Copy of departmental appeal against the impugned seniority list is not attached which may be placed on it.
11. Annexure-K of the appeal is illegible which may be replaced by legible/better one.
12. Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
13. Twenty five more copies/sets of the appeal along annexures i.e. complete in all respect may also be submitted with the appeal.

No. 43 /ST,

Di. 11/01 /2022.


REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

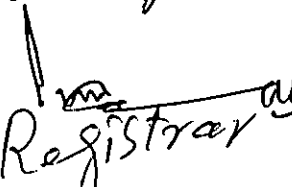
Mr. Saadullah Khan Marwat Adv. Pesh.

Sir,

Re. submitted after its completion

*Objections no. 4, 5 & 13 are still stand.
The appeal in hand is ret'd to counsel
for its completion within 15 days. 22/2/22*

*no. 532 /S.T
dt. 22/2 /2022*


Registrar

Sr,

Re-sub-~~mit~~ after seeing
the objections.

~~D. J.~~
Dorrr,

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Amir Muneer v/s Education Department

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _____	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Saeedullah Khan

Signature: Saeedullah Khan

Dated: 26/2/22

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. *233* /2022

Afsheen Mumtaz versus Director & Others

I N D E X

S. No	Documents	Annex	P. No.
1.	Memo of Appeal		1-7
2.	Appointment Order dated 17-11-1994	"A"	8-10
3.	M.Sc. Degree dated 06-05-2006	"B"	11
4.	Promotion Order dated 12-12-2006	"C"	12-13
5.	Up-gradation Letter to B-17 dated 13-11-2007	"D"	14-15
6.	Final Seniority List dated 31-03-2009	"E"	16-18
7.	Subsequent Seniority List dated 01-01-2017	"F"	19-21
8.	Representation to Director 04-02-2017	"G"	22-24
9.	Promotion to the post of Senior Instructor P.P. B-18 dated 23-05-2018	"H"	25-26
10.	Tentative Seniority List B-18 dated 31-12-2018	"I"	27-29
11.	Final Seniority List with covering letter dated 02-03-2021 / 26-10-2021	"J"	30-32
12.	Representation dated 29-10-2021	"K"	33-34

Through Appellant



Saadullah Khan Marwat
Advocate.
21-A Nasir Mansion,
Shoba Bazaar, Peshawar.
0311-9266609

Dated: 21-02-2022

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. _____/2022

Afsheen Mumtaz W/O Ayaz Hussain,
Senior Instructor, Physical Education,
GGHSS, Khyber Colony, Peshawar Appellant

VERSUS

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 26

Date 10-1-2022

1. Director, Elementary and
Secondary Education, KP,
Peshawar.
2. Secretary, Government of KP,
Elementary & Secondary
Education Department,
Peshawar.
3. Mst. Misbah Seema, Senior Instructor,
Physical Education, Govt. Girls Higher
Secondary School Munawar Shah No.
06. D. I. Khan. (S. No. 09)
4. Mst. Rahila Bano, Senior Instructor,
Physical Education, GGHSS, No. 05
Qasaban D. I. Khan. (S. No. 10)
5. Mst. Abida Parveen, Senior Instructor,
Physical Education, GGHSS, Mallkpora,
Abotabad. (S. No. 13)
6. Mst. Robina Shaheen, Senior Instructor,
Physical Education, GGHSS, Sikandar
Khel Bala Bannu. (S. No. 14)
7. Mst. Parveen Akhtar, Senior Instructor,
Physical Education, Govt. Girls Higher
Secondary School, Akora Khattak,
Nowshera. (S. No. 16)

Filed to-day

Registrar

8. Mst. Sughra Afandi, Senior Instructor,
Physical Education, GGHSS, Rustam
Khel Mardan. (S. No. 18)
9. Mst. Yahya Begium, Senior Instructor,
Physical Education, GGHSS Pir Piai
Nowshara. (S. No. 19)
10. Mst. Mufeeda Begium, Senior Instructor,
Physical Education, GGHSS, Shehbaz
Ghara, Mardan. (S. No. 22)
11. Mst. Samina Akhtar, Senior Instructor,
Physical Education, GGHSS, Comprehensive
Peshawar City. (S. No. 23)
12. Mst. Ghazala Naeem, Senior Instructor,
Physical Education, GGHSS, Behzad
Chakarkot Kohat. (S. No. 27)
13. Mst. Sujhat Begum, Senior Instructor,
Physical Education, GGHSS, Takhtbhai
Mardan. (S. No. 28)
14. Mst. Basreet Afzal, Senior Instructor,
Physical Education, GGHSS, Hathian
Mardan (S. No. 29)
15. Mst. Saima Gul, Senior Instructor,
Physical Education, GGHSS, Sherazi
No. 08 D. I. Khan. (S. No. 34)
16. Mst. Tasleem Kausar, Senior Instructor,
Physical Education GGHSS, Skhakot
Malakand (S. No. 35)
17. Mst. Maryum Rasooli, Senior Instructor,
Physical Education GGHSS, Kalabut
Township-II Haripur (S. No. 39)
18. Mst. Shaheen Ali, Senior Instructor,
Physical Education, GGHSS, Shewa
Swabi. (S. No. 40)

19. Mst. Mussarj Iqbal, Senior Instructor,
Physical Education GGHSS,
Esak Chuntra Karak (S. No. 41)
20. Mst. Sardar Bibi, Senior Instructor,
Physical Education, GGHSS, No. 01
Karak. (S. No. 42)
21. Mst. Sadia Hazrat, Senior Instructor,
Physical Education, GGHSS, Kopar
Malakand (S. No. 45)
22. Mst. Shahida Begium, Senior Instructor,
Physical Education, GGHSS, Esak Chuntra,
Karak (S. No. 46) Respondents

⇔<=>⇔<=>⇔<=>⇔<=>⇔

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST FINAL SENIORITY LIST OF SENIOR
INSTRUCTORS PHYSICAL EDUCATION
ELEMENTARY AND SECONDARY EDUCATION
DEPARTMENT KP PESHAWAR DATED 02-03-2021
OF R. NO. 01 WHEREBY JUNIOR TO APPELLANT
WERE SHOWN SENIOR WITHOUT ANY REASON
AND JUSTIFICATION:

⇔<=>⇔<=>⇔<=>⇔<=>⇔

Respectfully Sheweth;

1. That on 17-11-1994, appellant was appointed as Physical Education Teacher (Female) (PET) on the recommendation of Departmental Selection Committee with some terms and conditions contained therein and her name was figured at S. No. 19 of the order ibid. (Copy as annex "A")
2. That on 06-05-2006, appellant was awarded degree of Master of Science obtained from Gomal University, D. I. Khan. (Copy as annex "B")

3. That on 12-12-2006 on the recommendation of Departmental Promotion Committee, appellant was promoted to the post of Director Physical Education B-16 on regular basis and her name was figured at S. No. 20. (Copy as annex "C")
4. That on 13-11-2007, Secretary Education, Govt. of KP, Schools and Literacy Department issued Notification accorded up-gradation to the post of Librarians and Director Physical Education from B-16 to B-17 regular of the existing incumbents who hold Master Degree in the relevant subject. Her existing seniority position will remain intact.

Here it would be not out of place to mention that appellant was awarded degree of M. Sc on 06-05-2006 with B-17. (Copy as annex "D")

5. That on 31-03-2009, Director Education issued Final Seniority List wherein name of appellant was placed at S. No. 66. (Copy as annex "E")
6. That prior to the aforesaid exercise, up-gradation, promotion, seniority list, etc, no proper rules were in field, yet on 16-05-2009, for the first time service structure was given to the employees of the department.
7. That on 01-01-2017, subsequent seniority list was circulated wherein appellant name was figured at S. No. 54. This seniority list was also not prepared properly and per the mandate of law. Seniors were not assigned proper place in seniority list. (Copy as annex "F")
8. That on 04-02-2017 representation was submitted to the authority for correction of the aforesaid seniority vide covering list dated 04-02-2017. (Copy as annex "G")
9. That on 23-05-2018, the competent authority issued Notification for promotion of 60 female Instructors Physical Education B-17 to the post of Senior Instructor Physical Education B-18 in the department. The name of appellant was figured at S. No. 50. (Copy as annex "H")

10. That on 31-12-2018, Tentative Seniority List of B-18 female Senior Instructor Physical Education was circulated wherein the name of appellant was figured at S. No. 51. Being senior, proper place was not assigned to her. (Copy as annex "I")
11. That on 02-03-2021, Final Seniority List of Senior Instructors Physical Education B-18 (F) with covering letter dated 26-10-2021 was circulated wherein the name of appellant was placed at S. No. 44 instead of proper place. The said List was shown as draft seniority list and the department is going to make promotion over this list. (Copy as annex "J")
12. That on receipt of the said seniority list, appellant submitted representation on 29-10-2021 before authority which met dead response till date. (Copy as annex "K")

Hence, this appeal, Inter alia on the following grounds:-

GROUND

- a. That appellant was initially appointed on 17-11-1994 as PET and was promoted to the post of DPE on 12-12-2006. She was further promoted to the Senior Instructor B-18 on 23-05-2018. Similarly contesting respondents was initially appointed on 15-11-1984 and promoted to the post of DPE on 18-02-2003 B-16, while she was awarded B-17 on 14-10-2013 and B-18 on 18-04-2019. Same is the position of other respondents but instead contesting respondents were shown senior to appellant for no legal reason.
- b. That on 06-05-2006, result of appellant was declared by admitting her two degree of Master of Science and thereafter on 13-11-2007, she was upgraded to B-17 from B-16 on regular basis and was then entitled to seniority.

As against contesting respondents admitted to the degree of M. Sc and upgraded to the post of B-17 on regular basis.
- c. That as and when seniority list was issued by the respondents, the same was not based on legal footing and contesting respondents being junior were shown senior.

- d. That every seniority list as per the judgments of the apex court gives fresh cause of action to an aggrieved person to assail the same for her vested right.
- e. That as and when appellant filed representation for correction of the seniority list of B-18, Deputy Director (F & A) Elementary & Secondary Education KP, Peshawar forwarded the same to R. No. 02 on 06-12-2021 to look into the matter and to promote seniors amongst all the eligible candidates to B-19, meaning thereby that the former seniority lists were not prepared as per the mandate of law and seniority rules.
- f. That in preparing the seniority lists, seniority rules were not taken into task and juniors were placed seniors only and only on the pretext that the seniority positions of all candidates would remain intact. With due respect it is not the law to destroy legal right of a servant, but seniority shall follow seniority rules and not Notification dated 13-11-2007.
- g. That the impugned seniority list dated 02-03-2021 is not based on law and seniority rules but is based on favoritism, discrimination and malafide by placing seniors, juniors and their future rights were infringed for no legal reason and justification.
- h. That in numerous letters, respondents showed reservation over the seniority lists, meaning thereby that the same were not based on legal footing.
- i. That though the seniority lists were circulated time and again by the respondents but no merit position was assigned to the contesting respondents viz-a-viz appellant.
- j. That for the first time service structure was given in the year 2009 to the employees of the department and if such is the position, then the former exercise was of no avail to contesting respondents but was a futile exercise. All such actions were not based on law but were based on favoritism, discrimination and malafide.

It is, therefore, most humbly prayed that on acceptance of appeal, the impugned seniority list dated 02-03-2021 of R. No. 01 be set aside by placing appellant senior to contesting respondents, etc, with such other relief as may be deemed proper and just the circumstances of the case.



Appellant

Through



Saadullah Khan Marwat



Arbab Saiful Kamal



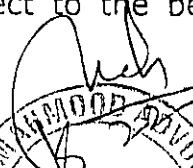
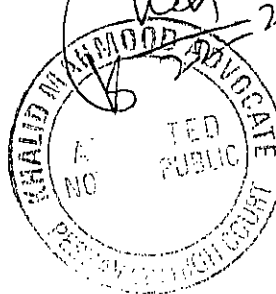
Amjad Nawaz

Advocates

Dated: 10-01-2022

AFFIDAVIT

I, Afsheen Mumtaz W/O Ayaz Hussain, Senior Instructor, Physical Education, GGHSS Khyber Colony, Peshawar (Appellant), do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief



DEPONENT

CERTIFICATE:

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.


ADVOCATE

A 8 17-11-1994

OFFICE OF THE DEPUTY DIRECTOR OF EDUCATION (SCHOOLS) PESHAWAR DIVISION PESHAWAR

APPOINTMENT

Consequent upon the recommendation of selection committee, the following candidates are hereby appointed against PET (Female) Posts in the P.M Fixed School noted against each in Ex 2 @ Rs.1605-97-3060 plus usual allowances as admissible under the rules with effect from the date of their taking over Charge in the interest of Public Service. However the trained ^{PET} BTR are Placed in the graded Pay Rs.1605-97-3060).

S.No.	Name & Address	School Where Posted.	Remarks
1.	Shabeena Gulfam D/O FA Gulfam Vill; Badrashi Moh; Easa Khel Teh: & Distt: Nowshera	GGMS Aza Khel NSR	Vacant Post
2.	Shagufta Ihsan D/O Muhammad FA Ihsanullah Q.No.87/B Civil Quarter Kohat Road Peshawar	GGHS Mathra	-do-
3.	Zeenat Khattak D/O Khan Wali B.Sc Vill: & P.O Nowshera Cantt:	GGMS Palosi NSR	-do-
4.	Ulfat Yasmine D/O Shamsul Hussain Moh: Haider Colony Pandu Road Peshawar	GGMS Jamat Chd BA	-do-
5.	Humara Wardak D/O Wasal Khan BA Vill; Kot Tehsil & Distt: Chd	GGMS Ghari Kaka Khel Charsadda	-do-
6.	Musarat Ara D/O Muhammad Sadiq Vill: Badrashi, Moh: Easa Khel, Teh:	GGMS Dag Basood	-do-
7.	Toheed Begum D/O Gulzar Khan Moh: Babar Vill: Pir Pai NSR	GGHS Nizampur NSR	-do-
8.	Seema Naz D/O Zahir Ullah Raja Muhammad Khan Building No.1 Manki Sharif Road NSR Cantt:	GGMS Kahi NSR	-do-
9.	Ishrat Perveen D/O S.Sakhi Shah Inqilab Street No.1 Afghan Colony Peshawar City	GGMS Bobak Chd	-do-
10.	Rozeena D/O Muhammad Hussain H.No.36 Khushal Colony Nowshera Cantt:	GGMS Khattak Building NSR	-do-
11.	Iram Shafee D/O Shafi Ullah G.32 Old Jamrud Road University Road Town Chowk Peshawar	GGMS Tarnab Chd	-do-
12.	Asma Gul D/O Muhammad Umar Moh: Khan Khel Charsadda	GGHS Utmanzi Chd	-do-
13.	Haseena Gul D/O Abdul Fatah	GGHS Rajjar Chd	-do-
14.	Seema Naz D/O Arif Parvez	GGMS No.2 Pabbi	-do-
15.	Ghazala Siraj D/O Abdul Jalil Peshawar City	GGMS Sarkai Mulain Chd	-do-
16.	Rehana Yasmin D/O H.Ahmad Din Noor Street Zaryab Colony Pesh; City	GGMS Sarkai Jalal	-do-

Contd...P.2222.P1

- | | | Vacant Post |
|---|-------------------------------|-------------|
| 17) Tayaba Shreen D/O Ihsan Ul Haq | GGMS Kangra Chd | |
| 18) Bibi Tahira D/O Said Gul Khan
Q.No.25/B Civil Quarter Kohat
Road Peshawar | GGMS Bashir Khan Killi
Chd | -do- |
| 19) Afsheen Mumtaz D/O Muhammad Akbar ^{Hafiz Mukhtar}
H.No.119 Moh:Bajori Kalan Dabgarl
Gate Peshawar | GGMS Behola Chd | -do- |
| 20) Shaheen Begum D/O Muhammad Zarif
Vill:& P.O Akbar Pura Nowshera | GGMS Pashongri NSR | -do- |
| 21) Pervin Akhtar D/O Muhammad Sadiq
Amir Abad Tangi Charsadda | GGMS Mandani Chd | -do- |
| 22) Fezia Sharif D/O Muhammad Sharif
Gunj Peshawar | GGMS Taru Jabba NSR | -do- |

Contd:....P.333....P1

TERMS AND CONDITIONS.

1. Their appointment are made purely on temporary basis and will be liable to termination at any time without assigning any reason or notice.
2. In Case of resignation he will have to submit one Months prior notice to the Department or forfeit one months pay in lieu thereof to the Govt:
3. They are required to produce health and age certificate from the concerned civil surgeon/Medical Supdtt: before taking over Charge provided they are not in Govt: Service.
4. They should not be allowed to take over Charge if their age are less than eighteen years and more than forty two years, in case of CT, DM, PET, & AT teachers.
5. They must be Domiciled of Peshawar Division which should be checked before handing over Charge.
6. Their enticedents forms should be obtained to be verified by the local Police authorities and submit to this office to gether with application provided they are not in Govt: Service.
7. All Original Certificates/Degrees and record may be Positi-vely Checked and Verified from the institutions / Organiza-tions/Deaprtment and if any discrepance their actually ocured the Case may be processed under the law and rules.
8. If any One fails to take over Charge within forthnight the offer of appointment will be considered as cancelled the head of institutions will inform about this facts.
9. Charge report including it should be sent to all concerned.
10. No. TA/DA Etc: is allowed to any One.
11. An undertaking duly witnessed attested by the Heads of Institutions may be obtained about the correctness of his Certificates and other documents and with the clear out words that he will be responsible for any drasitic consequancies and will liable to be proceeded under the laws and rules and regulations for production of bogus/incorrect Certificates/testimonials detected if any ~~exige~~ stages of his Service.
12. They will be governed by the Service rules frame by the Govt: from time to time.

(SHAH-I-ROOM KHAN,)

Divisional Director of Education (Schools)
Peshawar Division Peshawar.Endst: No. 612-675Dated Peshawar the 27/11/94.

Copies to the:

- 1:- Private Secretary to Minister for Education NWFP.
- 2:- PA to Director Secondary Education NWFP.
- 3:- Accountant General NWFP Peshawar.
- 4:- DEO's Secondary (Male/Female) Peshawar, Charsadda, Nowshera.
- 5:- All Principals/Headmaster Concerned.
- 6:- All Teachers Concerned.

Dy: Directress 10/11/94

For/Divisional Director of Education (Schools)
Peshawar Division Peshawar.

B
Serial No. G.U. 005508

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ
GOMAL UNIVERSITY
DERA ISMAIL KHAN
(K.W.P.F) PAKISTAN
KHYBER PAKHTUNKHWA



(Session 2005-2006)

AFSHEEN HILTAZ DAUGHTER OF MUKHTIAR AHMAD and
a student of COLLEGE OF PHYSICAL EDUCATION & RESEARCH PESHAWAR
having passed the prescribed examination in JANUARY 2006
is this day admitted by the GOMAL UNIVERSITY to the DEGREE of

MASTER OF SCIENCE

in the FIRST Class

The subject of examination being HEALTH & PHYSICAL EDUCATION

The Examination was taken as a whole/in parts

Registered No. 07-OPER-2003

Roll No. 250

Result declared on MAY 6, 2006

Countersigned

DS
Controller of Examinations

M. Mumtaz
Vice-Chancellor

13 12-12-06

DIRECTORATE OF SCHOOLS & LITERACY N.W.F.P. PESHAWAR.

ORDER

Consequent upon the recommendation of the Departmental Promotion Committee held on 21/10/2006 under the chairmanship of Secretary Schools & Literacy Department the Competent Authority has been pleased to promote the following Male & Female (PBT/CT/DM and TT etc) teachers to the Post of DPE in OPS-16 on Regular Basis plus usual allowances as admissible under the rules with immediate effect and post them in the schools as noted against each name subject to the following conditions:

S.No	Name	Father's Name	Domicile	Address	Place of posting	Remarks
1	Mr Paltzullah Khan	Shadi Khan	NWA	GMS Kari Rogha, NWA	GHSS Ingh Maidan, Dir (L)	Against vacant post
2	Mr Kamran Ali	Muhammad Nawab	Swabi	GMS Mithra Swabi	GHSS Nagri Hunair	-do-
3	Mr Sabir Ali	Mamoor Khan	Swabi	GHSS No.1 Yar Husain, Swabi	GHSS Chantar Mardan	-do-
4	Mr Mushiq Zada	Parves Khan	Hunan	GHSS No.2 Dappar	GHSS Qulezat, Hunair	-do-
5	Mr Anisullah	Abdul Majid Khan	Karak	GHSS Tar Dhand Karak	GHSS Safaid Sang, Peshawar	-do-
6	Mr Uzraat Ali	Mir Afzal	Karak	GHSS Khojaki Kita, Karak	GHSS Muzanzil, Peshawar	-do-
7	Mr Muhammad Iqbal	Wali Dad Khan	Karak	GHSS Jundari Karak	GHSS Haya Surri, Dir Lower	-do-
8	Mr Zamrud Shah	Zainul Abidin, Karak	Karak	GHSS Terki Khesl, Karak	GHSS Munda, Dir Lower	-do-
9	Mr Aashad Hussain	Pazal Hussain	Nowshera	GHSS Dag Besont Nowshera	GHSS Nahaqi, Peshawar	-do-
10	Mr Nowsher Zaman	Umair Nawaz Khan	Hunan	GMS Aduni Husool Khan, Hunan	GHSS Zinrai Talash Dir Lower	-do-
11	Ms Pakhrj Anjum	Sayed ul Arofin	Nowshera	GGMS Barn Hunda, Nowshera	GGHSS Shahbaz Garhi, Mardan	-do-
12	Ms Nighat Soomn	Sayed Amir Shah	Peshawar	GGHSS Hayatubud Peshawar	GGHSS Sherwan A. Ahad	-do-
13	Ms Maryum Rasool	Ghulam Rasool	Harpur	GGHMS Harpur	GGHSS Kalabat Township Harpur	-do-
14	Ms Saeeda Gul	Sher Bahadar Khan	NWA	GGMS Civil Colony Miran Shah NWA	GGHSS Kumbhar Maidan, Dir (Lower)	-do-
15	Mr Shaheen Ali	Abdul Ali	Swabi	Joan Model School, Lalora, Swabi	GGHSS Shown Swabi	-do-
16	Ms Gul Dari	Mula Julal	Karak	GGMS Mankai Hunda, Karak	GGHSS Kulpoti, Hunan	-do-

17	Ms Munarij Iqbal	Amal Noor	Karak	GGHSS Bogara Karak	GGHSS Chumbal Kohat	-do-
18	Ms Saadur Jilal	Khama Gul	Karak	GGMS Amir Badshah Korona, NVA	GGHSS Malto Swat	-do-
19	Ms Sharaz Taj	Taj Nabi	Mardan	GGMS Kala Kal, Mardan	GGHSS Sawal Dher, Mardan	-do-
20	Ms Afshoon Mumtaz	Lata Hafiz Mukhtar Ahmad	Peshawar	GGMS Mohmand Abdul Peshawar	GGHSS Kalabat, Swabi	-do-
21	Ms Sadia Hazrat	Muhammad Hazrat	Dir Lower	GGMS Munjal Dir Lower	GGHSS Kopar Malakand	-do-
22	Ms Shahida Begum	Gul Noor Khan	Karak	GGHS Dabb Karak	GGHSS Zafar Talah Dir Lower	-do-
23	Ms Rehana Yasmeen	(Late) Hafiz Ahmad Dm	Peshawar	GGMS Zaryab Colony, Peshawar	GGHSS Kahal, Swat	-do-
24	Ms Hussain Unari	Taj Ali	Peshawar	GGMS No.2 Chulshar Peshawar	GGHSS Topi Swabi	-do-
25	Ms Saira Altaf	Altaf Hussain	Abbottabad	GGHS Saji Kot Abbottabad	GGHSS Hajia Gali, Abbottabad	-do-
26	Ms Sajida Nowshoon	Abdul Azla	Peshawar	GGHSS BSD Peshawar	GGHSS Gujrat Mardan	-do-
27	Ms Taleem Begum	Shorin Nawab	Malakand	GGHSS Dargai Malakand	GGHSS Malakand Malakand Swat	-do-
28	Ms Nazima Shahoon	Saidur Khan	Peshawar	GGMS Kokar Peshawar	GGHSS Muthra Peshawar	-do-
29	Ms Dil Afroz	Amir Nawaz Khan	Peshawar	GGMS Kokar, Peshawar	GGHSS Kota Swabi	-do-

TERMS AND CONDITIONS OF THEIR APPOINTMENTS.

1. They will be governed by such rules and regulations as may be prescribed from time to time by the Govt; for the category of the Govt. servants to whom they belong.
2. Their services will be liable to be terminated on one month's notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
3. The Service of newly appointees should check whether they had been working on Contract or Regular basis before their appointment as DPE in case the in service teachers working on contract basis and appointed on regular basis against DPE post by virtue of this appointment, their order will be revised and they will appointed on contract basis. The EDO (S&L) concerned should immediately inform the Director Schools & Literacy in this respect.
4. The appointees should join their post within 15 days of the issuance of this order. The EDO's (S&L) should furnish a certificate to the effect that the appointees have join the posts or otherwise, after one month of the issue of this order.
5. Their services can be terminated at any time in case their performance is found unsatisfactory and they will be proceeded against under Removal from service (Special Power) Ordinance 2000 and E&D Rules 1973.
6. They shall be required to furnish copies of all their certificates/diplomas along with the original receipts and photo copies thereof pertaining to the verification fee of the concerned examining body (Board/University) to the EDO (S&L) concerned.
7. The EDO (S&L) concerned should check their original Certificates/Diplomas.
8. No TADA etc. will be allowed to the Appointees.
9. Charge reports should be submitted to all concerned.

NWFP, Peshawar

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13-11-07

GOVERNMENT OF N.W.F.P.
SCHOOLS & LITERACY DEPARTMENT
Dated, Peshawar the 13-11-2007.

NOTIFICATION.

No. **SOG/S&L/1-69/06/Vol-1/DPE/LIB**: Sanction of the competent authority is hereby accorded to the upgradation of the posts of Librarians and Directors Physical Education (D.P.Es) from BS-16 to BS-17 (Regular) for the existing incumbents who hold Master Degree in the relevant subject Schools & Literacy Department NWFP with immediate effect as per following details:-

1. Promotion against the upgraded posts (from BS-16 to BS-17) shall be made in the prescribed manner, and in accordance with the service rules to be framed as per relevant provisions of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules 1989 read with the NWFP, Civil Servants Act, 1973.
2. The Librarians and D.P.Es who hold the diploma in the relevant subject will stay in BS-16 till such time, they acquire Master Degree in the respective subject. On Acquiring Master Degree in the relevant subject, their posts will be upgraded on case to case basis from BS-16 to BS-17 (Regular) and promotion (from BS-16 to BS-17) would be given as per laid down procedure and in accordance with the service rules to be framed. However their existing seniority will remain intact.
3. All the vacant posts of Librarians and D.P.Es in Schools & literacy department in BS-16 are hereby upgraded to BS-17 appointments against which would be made from amongst the persons who hold Master Degree in the relevant subject, in the prescribed manner.
4. In future Librarians and D.P.Es will initially be recruited on the basis of Master Degree in the relevant subject in BS-17 (Regular).
5. Henceforth no appointment of Librarians and D.P.Es in BS-16 shall be made on the basis of diploma, being declared as "Denying Cadre".

Sd/-

SECRETARY TO GOVERNMENT OF NWFP
SCHOOLS & LITERACY DEPARTMENT.

Endst: No. FD(SOSR-II) 10-7/03/VOL-III Dated, Peshawar the, 13/11/2007.

Copy forwarded for information and necessary action to:-

1. The Accountant General, NWFP, Peshawar.
2. All Districts Accounts Officers in NWFP.
3. All Agency Accounts Officers in NWFP.

Endst: No. & Date Even.

Copy forwarded to:-

1. Secretary to Government of NWFP, Establishment Department.
2. Secretary to Government of NWFP, Finance Department.
3. P.S to Chief Minister NWFP, Peshawar.
4. P.S to Chief Secretary NWFP, Peshawar.
5. Director Schools & Literacy, NWFP, Peshawar.
6. Director. Curr: & Teachers Edu: NWFP, Mandian Abbottabad.
7. Director of Education FATA NWFP, Peshawar.
8. P.S to Minister of Education, NWFP, Peshawar.
9. P.S to Secretary Schools & Literacy NWFP, Peshawar.
10. Office File.

31-3-09

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DIRECTRATE OF ELEMENTARY AND SECONDARY EDUCATION NWFP PESHAWAR FINAL SENIORITY LIST OF DPES BPS-16 SCHOOLS CADRE (WOMEN'S SECTION) N.W.F.P. CORRECTED UPTO,31-03-2009.

S.#	Name and Address	Qualification	D/O Birth	Domicile	D/O 1st Appointment	D/O Appnt As DPE	Method of Rec. By, PSC Or DPC
1	Mst. Zubaida Begum DPE GGHSS Sachakol Malakand	M.SCHPE	01.08.57	Malakand	01.08.75	01.11.1985	PSC
2	Mst. Nazhima Akbar DPE GGHSS G.Wala Bannu.	M.SCHPE	24.02.59	Bannu	14.10.84	14.10.1984	PSC
3	Mst. Mussarat Parveen DPE GGHSS Jangal Khel Kohat	M.SCHPE	03.08.57	Kohat	07.08.75	15.10.1984	PSC
4	Mst. Samina Habib DPE RITE (F) Kohat.	M.SCHPE	01.05.60	Kohat	01.09.81	23.02.1988	PSC
5	Mst. Dilshad Begum DPE GGHSS Bannu City	M.SCHPE	28.08.60	Bannu	27.05.79	20.08.1990	PSC
6	Mst. Safina Babar DPE GGHSS University Town Peshawar	M.SCHPE	28.01.62	Nowshera	26.08.90	26.08.1990	PSC
7	Mst. Shaheen Anwar DPE GGHSS K.Najibullah Haripur	M.SCHPE	03.05.63	Abbottabad	24.07.91	24.07.1991	PSC
8	Mst. Rehana Parveen DPE GGHSS No.2 D.I.Khan	M.SCHPE	10.02.63	D.I.Khan	25.07.91	25.07.1991	PSC
9	Mst. Shehmar Akhtar GGHSS No.2 BANNU.	M.SCHPE	03.03.71	Bannu	16.05.97	16.05.1997	PSC
10	Mst. Nosheen Alam DPE / ADO (F) BANNU.	M.SCHPE	8.8.1973	Bannu	16.05.97	16.05.1997	PSC
11	Mst. Shahida Begum DPE GGHSS Nowshera Kalan.	M.SCHPE		Nowshera		16.05.1997	PSC
12	Mst. Shabnam Jadoon DPE GGHSS Dhamtour A/Abad	M.SCHPE	05.04.68	Abbottabad	16.05.97	16.05.1997	PSC
13	Mst. Tamsela Naz DPE GGHSS Pharpur D.I.Khan	M.SCHPE	31.07.67	D.I.Khan	06.03.99	16.05.1997	PSC
14	Mst. Gul-Nar DPE GGHSS Comp: Abbottabad.	M.SCHPE	29.03.62	Abbottabad	03.05.99	16.05.1997	PSC
15	Mst. Naureen Anwar DPE GGHSS B.S.D Peshawar.	M.SCHPE	3.5.1968	Kohat	16.05.97	16.05.1997	PSC
16	Mst. Nadia Begum ADE&ES NWFP Pesh.	M.SCHPE	15.05.64	Peshawar	23.11.85	16.05.1997	PSC
17	Mst. Shahbaz Begum DPE GGHSS Shah Saki Munawar D.I.Khan	M.SCHPE	15.03.64	D.I.Khan	09.12.1985	18.02.2003	DPC
18	Mst. Misbah Seema DPE ADO (F) Tank	M.SCHPE		D.I.Khan	11.02.1992	15.02.2003	DPC
19	Mst. Rahila Bano DPE GGHSS Mathra Peshawar	SDPE/HPE	24.03.68	D.I.Khan	31.05.1992	18.02.2003	DPC
20	Mst. Rafia Khattak DPE GGHSS Shabqadar Fort Charsadda	M.SCHPE	09.09.67	Karak	16.11.1994	18.02.2003	DPC
21	Mst. Farzana Yasmin DPE GGHSS Akora Khattak NSR.	SDPE/HPE	01.05.72	D.I.Khan	22.04.1996	18.02.2003	DPC
22	Mst. Hamida Begum DPE GGHSS Kulachi D.I.Khan	M.SCHPE	01.01.67	D.I.Khan	11.01.1996	18.02.2003	DPC
23	Mst. Abida Parveen DPE GGHSS Malakpura Abbottabad	M.SCHPE	20.10.68	Abbottabad	01.10.1997	18.02.2003	DPC
24	Mst. Rubina Shaheen DPE GGHSS S.K.Bala Bannu.	M.SCHPE	02.01.72	Bannu	07.11.1997	18.02.2003	DPC
25	Mst. Nabila Tabasum DPE GGHSS Chamkani Pesh.	M.SCHPE	25.04.70	D.I.Khan	25-6-1997	30.08.2003	DPC
26	Mst. Yasmin Begum DPE GGHSS RITE (F) Charsadda	SDPE/HPE	01.01.61		13.03.1986	18.02.2003	DPC
27	Mst. Saeeda Begum DPE GGHSS Chamkani Peshawar.	M.SCHPE	01.01.64	Peshawar	13.03.1986	30.08.2003	DPC
28	Mst. Rubina Khurshid DPE GGHSS Umarzai Charsadda	SDPE/HPE	15.07.68	D.I.Khan	17-11-1986	18.02.2003	DPC
29	Mst. Rani Begum DPE GGHSS Comprehensive Peshawar	SDPE/HPE	01.10.69	Peshawar	27.10.1993	18.02.2003	DPC

30	Mrs. Parveen Akhtar DPE GGHSS Toru Mardan.	MSc/HPE	15.11.66	Mardan	15.11.1984	18.02.2003	DPC
31	Mst. Ganish Begum DPE GGHSS Shah Dhand Mardan.	MSc/HPE	14.04.69	Mardan	28.02.1995	18.02.2003	DPC
32	Mst. Sughra Afandi DPE GGHSS Gujral Mardan.	MSc/HPE	01.05.70	Mardan	10.10.1995	18.02.2003	DPC
33	Mst. Yasmin Gul DPE GGHSS Turangzal	MSc/HPE	18.03.71	Moh. Agency	30.08.1999	18.02.2003	DPC
34	Mst. Shabnam Raza DPE GGHSS Shakardara Kohat	MSc/HPE	03.09.69	Peshawar	01.03.1993	06.06.2005	DPC
35	Mst. Noor Akhtar DEP GGHSS Shabazgahi Mardan	MSc/HPE	03.04.76	Mardan	30.08.1995	06.06.2005	DPC
36	Mst. Rehana Khatoon DEP GGHSS Chokara Karak	MSc/HPE	01.01.60	Karak	18.01.1998	06.06.2005	DPC
37	Mst. Naheed Gohar DPE GGHSS Babri Banda Kohat	MSc/HPE	04.03.69	Mansehra	17.03.1993	10.06.2005	DPC
38	Mst. Mufida Begum DPE GGHSS Kalou Khan Swabi	SDPE/HPE	31.03.1971	Swabi	11.12.1990	07.05.2005	DPC
39	Mst. Samina Akhtar DPE GGHSS Teri Karak	SDPE/HPE	15.03.1974	Karak	23.05.1992	07.05.2005	DPC
40	Mst. Farhana Ishaq DPE GGHSS Comp. A-Abad	SDPE/HPE	19.08.70	Abbottabad	31.07.1995	05.06.2005	DPC
41	Mst. Yahya Begum DPE GGHSS Shaidu Novshera	SDPE/HPE	08.05.73	Karak	03.10.1995	05.06.2005	DPC
42	Mst. Asma Qureshi DPE GGHSS Bellang Kohat	MSc/HPE	08.05.78	Peshawar	20.01.1995	06.06.2005	DPC
43	Mst. Monaza Jabeen DPE GGHSS Sherpao Charsadda	MSc/HPE	16.10.75	Peshawar	13.11.1995	06.06.2005	DPC
44	Mst. Aera Naz GGHSS Toru Mardan	MSc/HPE	01.02.70	Mardan	09.03.1998	06.06.2005	DPC
45	Mst. Ghazala Naem DPE GGHSS Koha Swabi	MSc/HPE	15.02.68	Kohat	01.01.1988	06.06.2005	DPC
46	Mst. Ghazala Naem DPE GGHSS Koha Swabi	MSc/HPE	05.09.1972	Mardan	30.09.1996	06.06.2005	DPC
47	Mst. Suhail Begum DPE GGHSS Takhtbhai Mardan	MSc/HPE	01.08.66	Peshawar	01.03.1992	06.06.2005	DPC
48	Mst. Adeeba Naheed DPE GEC (F) Jamrud Agency	MSc/HPE	20.04.1952	Peshawar	09.09.1976	03.05.2005	DPC
49	Mst. Saida Sofi DPE GGHSS Com. Peshawar	MSc/HPE	12.10.74	Malakand	24.05.2008	24.05.2005	PSC
50	Mst. Taseem Kousar DPE GGHSS Sakhtkor Malakand	MSc/HPE	28.04.79	D.I Khan	24.05.2008	24.05.2005	PSC
51	Mst. Fatma Gul DPE GGHSS Topi Swabi	MSc/HPE	12.10.80	Bannu	24.05.2008	24.05.2005	PSC
52	Mst. Rahila Gul DPE GGHSS Gumbat Kohat	MSc/HPE	05.05.83	Bannu	24.05.2008	24.05.2005	PSC
53	Mst. Shahana DPE GGHSS Kaki Bannu	MSc/HPE	01.06.78	Bannu	24.05.2008	24.05.2005	PSC
54	Mst. Mehnaz Ayaz DPE GGHSS Tilerkhal Lakki Marwal	MSc/HPE	27.11.78	Abbottabad	24.05.2008	24.05.2005	PSC
55	Mst. Maryam Mustafa DPE GGHSS Havelan A-Abad	MSc/HPE	05.04.80	Fardour	24.05.2008	24.05.2005	PSC
56	Mst. Saima Andaleeb DPE GGHSS Pennian Hanpur	MSc/HPE	15.12.78	Peshawar	14.1.1998	24.05.2005	PSC
57	Mst. Imtiaz Tabassum DPE GGHSS Pipai Novshera	MSc/HPE	20.02.84	Mardan	24.05.2006	24.05.2005	PSC
58	Mst. Besree Afzal DPE GGHSS Umarzal Charsadda	MSc/HPE	13.04.77	Mardan	14.12.1999	12.12.2005	DPC
59	Mst. Fakhir-E-Anjum DPE GGHSS Hallan Mardan	MSc/HPE	05.11.70	Novshera	13.03.1993	12.12.2005	DPC
60	Mst. Nighat Seema DPE GGHSS Shervan A/Abad	SDPE/HPE	07.01.70	Hanpur	01.09.1993	12.12.2005	DPC
61	Mst. Maryam Rasool DPE GGHSS Hanpur	MSc/HPE	12.12.75	Swabi	01.04.2004	12.12.2005	DPC
62	Mst. Shaheen Ali DPE GGHSS Sheva Swabi	SDPE/HPE	05.01.62	Karak	09.11.1979	12.12.2005	DPC
63	Mst. Gul Dan DPE GGHSS Kalpani Punjir	SDPE/HPE	08.01.70	Karak	13.11.1990	12.12.2005	DPC
64	Mst. Sardar Bori DPE GGHSS Malia Swabi	SDPE/HPE	30.05.70	Karak	01.12.1994	12.12.2005	DPC

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65	Mst. Sheraz Taj DPE GGHSS Sawal Dhar Mardan	SDPE/HPE	09.11.76	Mardan	08.01.1996	12.12.2006	DPC
66	Mst. Afshen Muntaz DPE GGHSS Kalahat Swabi	MSch/HPE	23.12.74	Peshawar	20.11.1994	12.12.2006	DPC
67	Mst. Saida Hazrat DPE GGHSS Kopar Malakand	MSch/HPE	05.03.83	Malakand	02.12.2004	12.12.2006	DPC
68	Mst. Shaheeda Begum GGHSS	SDPE/HPE	15.12.76	Karak		12.12.2006	DPC
69	Mst. Rahana Yasmeen GGHSS Kabal Swat	MSch/HPE	30.04.71	Peshawar	17.11.1994	12.12.2006	DPC
70	Mst. Hassan Basri DPE GGHSS Topi Swabi	MSch/HPE	02.03.72	Peshawar	10.07.1997	12.12.2006	DPC
71	Mst. Sara Itaf DPE GGHSS Abbottabad	MSch/HPE	01.01.81	Abbottabad	26.08.2005	12.12.2006	DPC
72	Mst. Saida Nousheen DPE GGHSS Lady Griffin Peshawar	MSch/HPE	27.07.60	Peshawar	02.09.1980	12.12.2006	DPC
73	Mst. Tasleem Baqum DPE GGHSS Chakdara Dir(L)	SDPE/HPE	11.11.60	Malakand	05.12.1984	12.12.2006	DPC
74	Mst. Nazma Shaheen DPE GGHSS Mafira Peshawar	SDPE/HPE	30.05.77	Peshawar	1996	12.12.2006	DPC
75	Mst. Dil Afroz DPE GGHSS Utman Zai Charasada	SDPE/HPE	01.05.57	Peshawar	01.03.1980	12.12.2006	DPC
76	Mst. Robina Shaheen DPE GGHSS Kallang Mardan	MSch/HPE	24.01.1965	Mardan	04/02/2005	10/02/2009	DPC
77	Mst. Riffat Shaheen DPE GGHSS Balakot Mardan	MSch/HPE	01.03.1967	Mardan	19/02/2004	10/02/2009	DPC
78	Mst. Anita Saleem DPE GGHSS Khair Abad Nowshera	MSch/HPE	01.09.1972	Peshawar	20/10/1993	10/02/2009	DPC

Director Elementary and Secondary Education
N.W.F.P. Peshawar

Certificate


It is certified that the above Seniority List of DPEs (Female) of Elementary and Secondary Education is final and corrected upto 31.03.2009

Encls: No. 11445-1156 DPEs Seniority List

Dated Peshawar the 7/11 2009

Copy of the above is forwarded to the:-

- 1 Director of Education (FATA) NWFP Peshawar
- 2 Director of Bureau of Curriculum & Teacher Education NWFP Abbottabad
- 3 Principals GGHSS Concerned.
- 4 PS to Secretary Govt. of NWFP Elementary and Secondary Education Department
- 5 PA Director Elementary and Secondary Education NWFP Peshawar
- 6 Master File


 Deputy Director Elementary and Secondary Education
 N.W.F.P. Peshawar
 14/12

DPC Seniority List (Final) Muzam Khan

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FINAL SENIORITY LIST OF OFFICER-BS-17 (FEMALE) PHYSICAL EDUCATION CADRE OF ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT AS ESTABLISHED ON 30.01.2017

Sl. No.	Name of Officer with Academic Qualification	Date of Birth	District	D/O 1st Entry into Govt Service	D/O Appnt. as DPE HS-16 (Regular)	Regular appointment / Promotion / Transfer post			Place of Posting	Remarks
						Date	Post	By Promotion / Transfer		
1	MST. NAHIMA AKBAR MSC (HPE)	24.02.1959	HANNU	14.10.1984	14.10.1984	19.05.2009	17	By Promotion	GGHSS Qamar Zaman Mandew Hanbur	
2	MST. MUSSARAT PARVEEN MSC (HPE)	03.08.1957	KOHAT	07.06.1975	15.10.1984	19.05.2009	17	do	GGHSS Jungal Khel Kohat	
3	MST. SAMINA HABIB MSC (HPE)	01.05.1960	KOHAT	01.09.1981	23.02.1988	15.06.2009	17	By P.S.	GGHSS Biltang Kohat	Already promoted to BS-18 on regular basis
4	MST. DILSHAD BEGUM MSC (HPE)	28.08.1960	PESHAWAR	27.05.1979	20.08.1990	19.05.2009	17	By Promotion	GGHSS No.2 Hannu City	
5	MST. SAFINA DARAR MSC (HPE)	06.01.1962	NOWSHERA	26.08.1990	26.08.1990	19.05.2009	17	do	GGHSS BSD Peshawar working against Lib. Post	
6	MST. SHAHEEN ANWAR MSC (HPE)	03.06.1963	ABBOTTABAD	24.07.1991	24.07.1991	19.05.2009	17	do	Govt Comprehensive HSS Abbottabad	
7	MST. REHANA PARVEEN MSC (HPE)	10.02.1963	D.I. KHAN	24.07.1991	24.07.1991	19.05.2009	17	By P.S.	GGHSS Prova DI Khan	
8	MST. SHAHIDA BEGUM MSC (HPE)	01.09.1967	NOWSHERA	07.01.1990	16.05.1997	19.05.2009	17	By Promotion	GGHSS Nowshera Kalan	
9	MST. NOSHEEN ALAM MSC (HPE)	08.08.1973	BANNU	16.05.1997	16.05.1997	16.08.2016	17	do	GGHSS Dheri Saidin Mamash Khel Bannu	Already appointed in BS-18 on ACE
10	MST. SHABNAM JADOON MSC (HPE)	05.04.1968	ABBOTTABAD	16.05.1997	16.05.1997	19.05.2009	17	do	GGHSS Dhamtour Abbottabad	Already promoted to BS-18 on regular basis
11	MST. TAMELLA NAZ MSC (HPE)	31.08.1967	DI KHAN	06.03.1990	16.05.1997	19.05.2009	17	do	R.I.T.E (F) DI Khan	
12	MST. NAUREEN ANWAR MSC (HPE)	03.05.1968	KOHAT	16.05.1997	16.05.1997	19.05.2009	17	do	RIT: (F) Peshawar	
13	MST. SHAHNAZ BEGUM MSC (HPE)	15.03.1964	DI KHAN	09.12.1985	18.02.2003	19.05.2009	17	do	GGHSS Cha Saib Mannwar D.I Khan	Retired on Medical Grounds
14	MST. SAECEDA BEGUM MSC (HPE)	01.01.1964	PESHAWAR	13.03.1986	18.02.2003	19.05.2009	17	do	GGHSS Chumkani Peshawar	Already promoted to BS-18 on regular basis
15	MST. MISBAM SEEMA MSC (HPE)	14.05.1964	D.I. KHAN	11.02.1992	18.02.2003	13.10.2010	17	do	GGHSS Chah Saib Mannwar Shah No. 6 DI Khan	
16	MST. RAHILA BANO MSC (HPE)	24.03.1966	DI KHAN	31.05.1992	18.02.2003	13.10.2010	17	do	GGHSS No.5 Qasaban DI Khan	
17	MST. RAFLA KHATTAK MSC (HPE)	09.09.1967	KARAK	16.11.1994	18.02.2003	19.05.2009	17	do	GGHSS Khyber Colony Peshawar against SS post	
18	MST. FARZANA YASMEEN MSC (HPE)	01.05.1972	DI KHAN	22.04.1996	18.02.2003	16.08.2016	17	do	GGHSS Kulachi DI Khan	Already appointed in BS-18 on ACE
19	MST. HAMIDA BAGEM MSC (HPE)	01.01.1967	DI KHAN	11.01.1996	18.02.2003	19.05.2009	17	do	GGHSS No. 9 Din Pur DI Khan	Already promoted to BS-18 on regular basis
20	MST. ABIDA PARVEEN MSC (HPE)	20.10.1966	ABBOTTABAD	01.10.1992	18.02.2003	15.06.2009	17	do	GGHSS Malakpura Abbottabad	
21	MST. ROBINA SHAHEEN MSC (HPE)	02.01.1972	BANNU	07.11.1992	18.02.2003	15.06.2009	17	do	GGHSS Sikandar Khel Hala Bannu	
22	MST. NABILA TABASUM MSC (HPE)	25.04.1970	D.I. KHAN	25.06.1997	18.02.2003	19.05.2009	17	do	GGHSS No.2 Peshawar Cantt.	
23	MST. PARVEEN AKHTAR MSC (HPE)	15.11.1966	MARDAN	15.11.1984	18.02.2003	24.10.2013	17	do	GGHSS Akera Khattak NSIT	Already appointed in BS-18 on ACE

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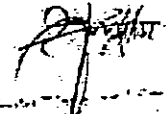
25	MST. DANISH GUL MSC (HPE)	11.04.1969	MARDAN	28.02.1995	18.02.2003	19.05.2009	17	-do-	GGHSS Shah Dildar Mardan	Already appointed in BS-18 on regular basis
26	MST. SUGRA AEWANJ MSC (HPE)	01.05.1970	MARDAN	10.10.1995	18.02.2003	15.06.2009	17	-do-	GGHSS Rustam Khel Mardan	do
26	MST. NIGAR AKHTAR MSC (HPE)	03.04.1976	MARDAN	30.08.1995	06.06.2005	19.05.2009	17	-do-	GGHSS Nowshera Cantt	do
27	MST. YAHYA BEGUM MSC (HPE)	08.06.1973	KARAK	03.10.1995	06.06.2005	24.10.2013	17	-do-	GG Comprehensive HSS Peshawar City	Already appointed in BS-18 on ACS
28	MST. REHANA KHATOON MSC (HPE)	01.01.1960	KARAK	18.01.1998	06.06.2005	19.05.2009	17	-do-	GGHSS Chokura Karak	Already promoted to BS-18 on regular basis
29	MST. NAHED GOHAR MSC (HPE)	04.03.1969	MANSEHRA	12.03.1993	06.06.2005	19.05.2009	17	-do-	GGHSS Bahri Banda Kohat	do
30	MST. MUFEEEDA BEGUM MSC (HPE)	31.08.1971	SWABI	11.12.1998	06.06.2005	16.05.2013	17	-do-	GGHSS: Shahbaz Garhi Mardan	do
31	MST. SAMINA AKHTAR MSC (HPE)	15.03.1974	KARAK	23.05.1992	06.06.2005	24.10.2013	17	-do-	GGHSS Pir Pai Nowshera	Already appointed in BS-18 on ACS
32	MST. ASMA QUARSHI MSC (HPE)	06.06.1976	PESHAWAR	20.01.1995	06.06.2005	19.05.2009	17	-do-	GGHSS Lady Griffin Peshawar	Already promoted to BS-18 on regular basis
33	MST. MUNAZA JABEEN MSC (HPE)	10.10.1975	PESHAWAR	23.11.1995	06.06.2005	19.05.2009	17	-do-	GGHSS Turnab Peshawar	do
34	MST. AZRA NAZ MSC (HPE)	01.02.1970	MARDAN	08.03.1998	06.06.2005	19.05.2009	17	-do-	GGHSS Toru Mardan	do
35	MST. GHUZALA NAEEM MSC (HPE)	15.02.1968	KOHIAT	01.01.1988	06.06.2005	13.10.2010	17	-do-	GGHSS Behzadi Chakarkot Kohat	do
36	MST. SUHAT BEGUM MSC (HPE)	05.09.1972	MARDAN	30.09.1996	06.06.2005	15.06.2009	17	-do-	GGHSS Takhtbhai Mardan	Already promoted to BS-18 on regular basis
37	MST. ADEEDA NAHEED MSC (HPE)	01.08.1966	PESHAWAR	01.03.1992	06.06.2005	19.05.2009	17	-do-	GEO (F) Jamrud Khyber Agency	do
38	MST. TASLEEM KAUSAR MSC (HPE)	12.10.1974	MALAKAND	24.05.2006	24.05.2006	16.05.2013	17	-do-	GGHSS Sakhakot Malakand	do
39	MST. SAJMA GUL MSC (HPE)	28.04.1979	DI KHAN	24.05.2006	24.05.2006	15.06.2009	17	-do-	GGHSS Paharpur Di Khan	do
40	MST. ROHILA GUL MSC (HPE)	12.10.1980	BANNU	24.05.2006	24.05.2006	19.05.2009	17	-do-	GGHSS Koti Sadat Bannu	do
41	MST. SHAHANA MSC (HPE)	05.05.1983	BANNU	24.05.2006	24.05.2006	19.05.2009	17	-do-	GGHSS Domel Bannu	do
42	MST. MARYAM MUSTAFA MSC (HPE)	27.11.1978	ABBOTTABAD	24.05.2006	24.05.2006	19.05.2009	17	-do-	RTE (Female) Abbottabad	do
43	MST. SAIMA ANDALJEED MSC (HPE)	05.04.1980	HARIPUR	01.09.2004	24.05.2006	19.05.2009	17	-do-	GGHSS Koi Najibullah Haripur	do
44	MST. IMTAZ TABASSUM MSC (HPE)	15.12.1978	PESHAWAR	14.01.1998	24.05.2006	19.05.2009	17	-do-	GGHSS Jogiwara Peshawar	do
45	MST. BASREET AFZAL MSC (HPE)	20.02.1984	MARDAN	24.05.2006	24.05.2006	13.10.2010	17	-do-	GGHSS Parkho Dberi Metzmood Abad Mardan	do
46	MST. FAKHAR-E-ANIUM MSC (HPE)	13.04.1977	MARDAN	14.12.1999	12.12.2006	19.05.2009	17	-do-	GGHSS Sawal Dher Mardan	Already promoted to BS-18 on regular basis
47	MST. NIGHAT SEEMA MSC (HPE)	05.11.1970	NEWSHERA	13.03.1993	12.12.2006	19.05.2009	17	-do-	Assistant Director DCTE KP Abbottabad	do
48	MST. MARYAM RASOOL MSC (HPE)	07.01.1970	HARIPUR	01.09.1993	12.12.2006	24.10.2013	17	-do-	GGHSS Kalabat Township No.2 Haripur	Already appointed in BS-18 on ACS
49	MST. SHAHEEN ALI BA MSC (HPE)	12.12.1975	SWABI	04.01.2004	12.12.2006	27.05.2009	17	-do-	GGHSS Shewa Swabi	Already promoted to BS-18 on regular basis
50	MST. GUL DARI MSC (HPE)	05.01.1962	KARAK	08.11.1979	12.12.2006	24.10.2013	17	-do-	GGHSS: Ismail Manna Khel Bannu	Already appointed in BS-18 on ACS

2021.03.01

44	MST. AFSANAH BINTI MISC (HPE)	08.01.1970	KARAK	14.11.1990	12.12.2006	24.10.2013	17	-do-	GGHSS, Kotka Bilawar Khan Hamro	do
45	MST. AFSANAH BINTI MISC (HPE)	30.05.1970	KARAK	12.01.1994	12.12.2006	25.10.2011	17	-do-	GGHSS No-1 Karak	Already promoted to BS-18 on regular basis
46	MST. ALIJEEN TAJ MISC (HPE)	09.11.1976	MARDAN	08.01.1996	12.12.2006	19.05.2009	17	-do-	GGHSS Gulfrat Mardan	do
47	MST. ALIJEEN MUMTAZ MISC (HPE)	24.11.1971	PESHAWAR	20.11.1994	12.12.2006	19.05.2009	17	-do-	GGHSS Khyber Colony Peshawar	do
48	MST. SAJIDA HAZRAT MISC (HPE)	05.04.1980	MALAKAND	02.12.2004	12.12.2006	15.06.2009	17	-do-	GGHSS Koper Malakand	do
49	MST. SHAHIDA BEGUM MISC (HPE)	15.12.1976	KARAK	17.05.1993	12.12.2006	24.10.2013	17	-do-	GGHSS Esok Chuntra Karak	Already appointed in BS-18 on ACB
50	MST. RAJIANA YASMEEN MISC (HPE)	30.01.1971	PESHAWAR	17.11.1994	12.12.2006	19.05.2009	17	-do-	GGHSS Wadpaga Peshawar	Already promoted to BS-18 on regular basis
51	MST. HUSSAN BASRI MISC (HPE)	02.01.1972	PESHAWAR	10.07.1997	12.12.2006	19.05.2009	17	-do-	GGHSS Sufaid Sung Peshawar	do
52	MST. SAIRA ILTAF MISC (HPE)	30.01.1981	ABBOTTABAD	26.06.2005	12.12.2006	15.06.2009	17	-do-	GGHSS Kakul Abbottabad	do
53	MST. SAJIDA NOUSHEEN MISC (HPE)	27.07.1960	PESHAWAR	02.09.1980	12.12.2006	19.05.2009	17	-do-	GGHSS Begum Shahabuddin Peshawar	do
54	MST. TASLEEM BEGUM MISC (HPE)	11.11.1960	MALAKAND	12.05.1984	12.12.2006	16.05.2013	17	-do-	GGHSS Chakdara Dir Lower	Doct
55	MST. NAZMA SHAHEEN MISC (HPE)	03.05.1977	PESHAWAR	01.10.1996	12.12.2006	16.05.2013	17	-do-	GGHSS Larana Peshawar	Already promoted to BS-18 on regular basis
56	MST. ROBINA SHAHEEN MISC (HPE)	24.01.1965	MARDAN	04.02.2005	10.02.2009	15.06.2009	17	-do-	GGHSS Rashakai Nowshera	do
57	MST. RIFFAT SHAHEEN MISC (HPE)	01.03.1967	MANSEHRA	19.02.2004	10.02.2009	15.06.2009	17	-do-	GGHSS Baffa Mansehra	do
58	MST. ARIFA SALEEM MISC (HPE)	01.09.1972	PESHAWAR	20.10.1993	10.02.2009	15.06.2009	17	-do-	GGHSS University Town Peshawar	do

It is Certified:-

- 1 That the Seniority list is widely circulated.
- 2 That Seniority list is undisputed/uncontroversial.
- 3 That there is no litigation pending/involved.


 Officer
 Elementary & Secondary Education
 Khyber Pakhtunkhwa

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The Hon'ble Director,
Elementary & Secondary Education,
Govt. of Khyber Pakhtunkhwa, Peshawar.

Subject:- **REQUEST FOR CORRECTION REGARDING SENIORITY
POSITION IN THE SENIORITY LIST**

Respected Sir,

With due respect I beg to lay down the following few lines for favour of sympathetic consideration: -

1. That I, Mst. Afsheen Mumtaz, have been performing my duties as Directress Physical Education in Govt. Girls Higher Secondary School, Khyber Colony, Peshawar since 24th November 2015 (**Annex-I**).
2. That I have been promoted in BS-17 on 19.05.2009 (copy of Promotion Order placed at **Annex-II**).
3. That I along with other aggrieved colleagues have made an appeal in Khyber Pakhtunkhwa Service Tribunal Peshawar regarding Seniority position being senior to other Junior colleagues. The said Tribunal had passed orders / judgment. Accordingly, the Elementary & Secondary Education Department, Peshawar have issued formal order vide No. SO(PE) 9-10 / DPE / Ghulam Nabi dated 29.04.2014 (copy of Office Order placed at **Annex-III**) from which the following clause is reproduced as under: -

"The Competent Authority is pleased to promote the following (List attached at Annex-IV) Directors Physical Education (DPEs) BS-16 to BS-17 on regular basis wef 13.11.2007 instead of 19.05.2009 notified vide this Department No. SO(PE)/2-6/E&SE//DPC/DPEs dated 19.05.2009".

In addition, the following clause especially submitted for your kind notice and reproduced as under: -

"The Competent Authority has further been pleased to promote the following DPEs who acquired prescribed qualification on or before 13.11.2007 but they did not challenge this department notification of even No. dated 19.05.2009."

S.No.	Name & Designation	Date of acquiring Master Degree In Physical Education
1
2
30	Mst. Afsheen Mumtaz DPE	06.05.2006
31
32

4. That the Elementary & Secondary Education Department, Govt of Khyber Pakhtunkhwa have issued Seniority List on 30.11.2016 (copy of Seniority List placed at **Annex-IV**) in which I have been placed at Junior position at S.No. 54 but the following DPEs being Junior to me have been made Senior due to which my legal and constitutional right has been violated: -

- i. Mst. Farzana Yasmeen (S.No. 17) promoted to BS-17 on 16.08.2016.
- ii. Mst. Parveen Akhtar (S.No. 23) promoted to BS-17 on 24.10.2013.
- iii. Mst. Yahya Begum (S.No. 30) promoted to BS-17 on 24.10.2013.
- iv. Mst. Sardar Bibi (S.No.52) promoted to BS-17 on 25.10.2011.

It is, therefore, requested that my Seniority position may kindly be corrected w.e.f 13.11.2007 instead of 19.05.2009 in accordance with the verdict of the judgment / orders of Khyber Pakhtunkhwa Service Tribunal Peshawar and orders / notification vide No. SO(PE) 9-10 / DPE / Ghulam Nabi dated 29.04.2014 issued by Elementary & Secondary Education Department, Peshawar.

Yours Sincerely,

Dated : 4 / 2 / 2017

(AFSHEEN MUMTAZ)
 Directress Physical Education,
 Govt. Girls Higher Secondary School
 Khyber Colony, Peshawar.

24

NO 484

DATED 04/07/2017

Office of the Principal
GGHSS Khyber Colony Peshawar

To

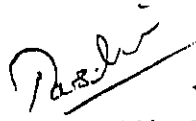
The District Education
Officer (F) Peshawar

Subject: CORRECTION OF SENIORITY NUMBER.

Memo: Enclosed please find here with an application for correction of seniority number in respect of Mst: Afsheen Mumtaz D.P.E of this school.

For further N/action please

Seniority list is attached.


PRINCIPAL
Govt. Girls Higher Secondary
GGHSS KHYBER COLONY Peshawar
PESHAWAR

they did not challenge this department notification of
even No. dated 19.05.2009."



25
23-5-18

H
GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the May 23rd, 2018

NOTIFICATION

NO. SO(S/F)E&SED/1-3/2018/PSB/Promotion/BS-17/BS-18/SIPE: Consequent upon recommendations of the Provincial Selection Board in its meeting held on 15-05-2018, the Competent Authority is pleased to promote the following sixty (60) Female Instructor Physical Education (BS-17) to Senior Instructor Physical Education (BS-18) of Elementary & Secondary Education Department on regular/ acting charge basis with immediate effect.

S#	Name of Officer	Present Station
1	Mst. Nagma Akbar	GGHSS Qamar Zaman Mandew Bannu
2	Mst. Samina Habib	GGHSS Bilitang Kohat
3	Mst. Dilshad Begum	GGHSS No. 2 Bannu City
4	Mst. Safina Babar	GGHSS BSD Peshawar
5	Mst. Shaheen Anwar	GGHSS Abbottabad
6	Mst. Rehana Parveen	GGHSS Parova D.I.Khan
7	Mst. Shahida Begum	GGHSS Nowshera Kalan
8	Mst. Shabnam Jadoon	GGHSS Dhamtour Abbottabad
9	Mst. Tamsila Naz	RITE (F) D.I.Khan
10	Mst. Naurcen Anwar	RITE (F) Peshawar
11	Mst. Saeeda Begum	GGHSS Chamkani Peshawar
12	Mst. Misbah Seema	GGHSS Chah Said Munawar Shah No. 6 D.I.Khan
13	Mst. Rahila Bano	GGHSS No. 5 Qasaban D.I.Khan
14	Mst. Rafia Khattak	GGHSS Khyber Colony Peshawar
15	Mst. Hamida Begum	GGHSS No. 9 Dinpur D.I.Khan
16	Mst. Abida Parveen	GGHSS Malakpura Abbottabad
17	Mst. Robina Shaheen	GGHSS SK Bala Bannu
18	Mst. Nabila Tabasum	GGHSS No. 2 Peshawar Cantt
19	Mst. Parveen Akhtar	GGHSS Akora Khattak Nowshera (acting charge basis)
20	Mst. Danish Begum	GGHSS Shahdhand Baba Mardan
21	Mst. Sughra Afandi	GGHSS Rustam Khel Mardan
22	Mst. Nigar Akhtar	GGHSS Nowshera Cantt
23	Mst. Yahya Begum	GGHSS Peshawar City (acting charge basis)
24	Mst. Rehana Khatoon	GGHSS Chokara Karak
25	Mst. Nahced Gohar	GGHSS Babri Banda Kohat
26	Mst. Mufeeda Begum	GGHSS Shahbaz Garhi Mardan (acting charge basis)
27	Mst. Samina Akhtar	GGHSS Pirpai Nowshera (acting charge basis)
28	Mst. Asma Quraishi	GGHSS Lady Griffith Peshawar
29	Mst. Munaza Jabeen	GGHSS Tarnab Peshawar
30	Mst. Azra Naz	GGHSS Toru Mardan
31	Mst. Ghazala Naeem	GGHSS Behazadi Chakar Kot Kohat
32	Mst. Sujhat Begum	GGHSS Takhtbhai Mardan
33	Mst. Adcebn Naheed	GEC (F) Jamrud Khyber Agency
34	Mst. Tasleem Kausar	GGHSS Sakhakot Malakand (acting charge basis)
35	Mst. Saima Gul	GGHSS Paharpur D.I.Khan
36	Mst. Rohila Gul	GGHSS Koti Sadat Bannu
37	Mst. Shahana	GGHSS Domail Bannu

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39	Mst. Saima Andaleeb	GGHSS Kot Najibullah Haripur
40	Mst. Imtiaz Tabassum	GGHSS Jogiwara Peshawar
41	Mst. Baseerat Afzal	GGHSS Parkho Dheri Mehmoodabad Mardan
42	Mst. Fakhar-e-Anjum	GGHSS Sawal Dher Mardan
43	Mst. Nighat Secma	DCTE Abbottabad
44	Mst. Maryam Rasool	GGHSS KTS No. 2 Haripur (acting charge basis)
45	Mst. Shaheen Ali	GGHSS Shawa Swabi
46	Mst. Gul Dari	GGHSS Ismail Mama Kheil Bannu (acting charge basis)
47	Mst. Mussarj Iqbal	GGHSS Kotka Bilawar Khan Bannu (acting charge basis)
48	Mst. Sardar Bibi	GGHSS No. 1 Karak
49	Mst. Sheraz Taj	GGHSS Gujrat Mardan
50	Mst. Afsheen Mumtaz	GGHSS Khyber Colony Peshawar
51	Mst. Sadia Hazrat	GGHSS Koper Malakand
52	Mst. Shahida Begum	GGHSS Esak Chountra Karak (acting charge basis)
53	Mst. Rehana Yasmeen	GGHSS Wadpaga Peshawar
54	Mst. Hassan Basri	GGHSS Sufaid Sung Peshawar
55	Mst. Saira Iltaf	GGHSS Kakul Abbottabad
56	Mst. Sajida Nousheen	GGHSS BSD Peshawar
57	Mst. Nazma Shaheen	GGHSS Larama Peshawar (acting charge basis)
58	Mst. Robina Shaheen	GGHSS Rashakai Nowshera
59	Mst. Riffat Shaheen	GGHSS Baffa Mansehra
60	Mst. Arifa Saleem	GGHSS University Town Peshawar

2. In terms of Section 6 (2) of Khyber Pakhtunkhwa Civil Servants Act, 1973 read with rule-15 (i) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) rules, 1989 the above female officers of the Teaching Cadre on their promotion shall be on probation for a period of one

3. The posting/ transfer of the above named Instructor Physical Education shall be notified later on.

4. No TA/DA will be allowed for joining their duties.

SECRETARY

Endst: of even No. & date:

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director Education (FATA) FATA Secretariat Warsak Road Peshawar.
4. Director DCTE Abbottabad.
5. Director PITE Khyber Pakhtunkhwa.
6. Director RITE (F) Khyber Pakhtunkhwa.
7. District Education Officers (Female) concerned. *Pesh*
8. District Accounts Officers concerned.
9. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.
10. PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
11. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
12. PS to Secretary E&SE Department.
13. PS to Special Secretary, E&SE Department.
14. Incharge EMISE, E&SE Department for uploading at official website at the earliest.
15. Senior Instructor Physical Education concerned.
16. Office order file.

Aniela Fahim
 (ANEELA FAHIM) 23/05/18
 SECTION OFFICER (SCHOOLS FEMALE)

SENIORITY LIST OF OFFICER BS-18 (FEMALE) SENIOR INSTRUCTOR PHYSICAL EDUCATION DATED 31-12-2018

S.No	Name of Officer with Academic Qualification	Date of Birth	Domicile	D/O 1st Entry into Govt	D/O Apptt: as DPE BS 15	D/O Award of BS-17 (Regular)	D/O Award of BS-18 (Regular)	Place of Posting
1	2	3	4	5	6	7	8	9
1	MST. NAGHMA AKBAR MSC (HPE) R	24.02.1959	BANNU	14.10.1984	14.10.1984	19.05.2009	23.05.2018	GGHSS Qamar Zaman Mandew Bannu.
2	MST. SAMINA HABIB MSC (HPE) P	01.05.1960	KOHAT	01.09.1981	23.02.1988	15.06.2009	23.05.2018	GGHSS Bilitang Kohat
3	MST. DILSHAD BEGUM MSC (HPE) R	28.08.1960	PESHAWAR	27.05.1979	20.08.1990	19.05.2009	23.05.2018	GGHSS Ghoriwala Bannu.
4	MST. SAFINA BABAR MSC (HPE) 1	06.01.1962	NOWSHERA	26.08.1990	26.08.1990	19.05.2009	23.05.2018	GGHSS University Town Peshawar
5	MST. SHAHEEN ANWAR MSC (HPE) 2	03.06.1963	ABBOTTABAD	24.07.1991	24.07.1991	19.05.2009	23.05.2018	Govt Comprehensive HSS Abbottabad
6	MST. REHANA PARVEEN MSC (HPE) 3	10.02.1963	D.I. KHAN	24.07.1991	24.07.1991	19.05.2009	23.05.2018	GGHSS Prova DI Khan
7	MST. SHAHIDA BEGUM MSC (HPE) 4	01.09.1967	NOWSHERA	07.01.1990	16.05.1997	19.05.2009	23.05.2018	GGHSS Nowshera Kalan.
8	MST. NOSHEEN ALAM MSC (HPE) (ACB)	08.08.1973	BANNU	16.05.1997	16.05.1997	16.08.2016	17/12/2018	GGHSS Dheri Saidan Mamash Khel Bannu
9	MST. SHABNAM JADOON MSC (HPE) 5	05.04.1968	ABBOTTABAD	16.05.1997	16.05.1997	19.05.2009	23.05.2018	GGHSS Dhamtour Abbottabad
10	MST. TAMSELLA NAZ MSC (HPE) 6	31.08.1967	D.I. KHAN	06.03.1990	16.05.1997	19.05.2009	23.05.2018	R.I.T.E (F) D.I Khan
11	MST. NAUREEN ANWAR MSC (HPE) 7	03.05.1968	KOHAT	16.05.1997	16.05.1997	19.05.2009	23.05.2018	R.I.T.E (F) Peshawar.
12	MST. SAEEDA BEGUM MSC (HPE) 8	01.01.1964	PESHAWAR	13.03.1986	18.02.2003	19.05.2009	23.05.2018	GGHSS Chamkani Peshawar
13	MST. MISBAH SEEMA MSC (HPE) 9	14.05.1964	D.I. KHAN	11.02.1992	18.02.2003	13.10.2010	23.05.2018	GGHSS Chah Said Munawar Shah No 6 DIKhan
14	MST. RAHILA BANO MSC (HPE) 10	24.03.1966	D.I. KHAN	31.05.1992	18.02.2003	13.10.2010	23.05.2018	GGHSS No.5 Qasaban DIKhan
15	MST. RAFIA KHATTAK MSC (HPE) 11	09.09.1967	KARAK	16.11.1994	18.02.2003	19.05.2009	23.05.2018	GGHSS Mathra Peshawar
16	MST. FARZANA YASMEEN MSC (HPE) (ACB)	01.05.1972	D.I. KHAN	22.04.1996	18.02.2003	16.08.2016	17/12/2018	GGHSS Kulachi D.I Khan
17	MST. HAMIDA BAGEM MSC (HPE) 12	01.01.1967	D.I. KHAN	11.01.1996	18.02.2003	19.05.2009	23.05.2018	GGHSS No. 9 Din Pur D.I.Khan
18	MST. ABIDA PARVEEN MSC (HPE) 13	20.10.1966	ABBOTTABAD	01.10.1992	18.02.2003	15.06.2009	23.05.2018	GGHSS Malakpura Abbottabad
19	MST. ROBINA SHAHEEN MSC (HPE) 14	02.01.1972	BANNU	07.11.1992	18.02.2003	15.06.2009	23.05.2018	GGHSS Sikandar Khel Bala Bannu.
20	MST. NABILA TABASUM MSC (HPE) 15	25.04.1970	D.I. KHAN	25.06.1997	18.02.2003	19.05.2009	23.05.2018	GGHSS No.2 Peshawar Cantt.
21	MST. PARVEEN AKHTAR MSC (HPE) 16	15.11.1966	MARDAN	15.11.1984	18.02.2003	24.10.2013	23.05.2018	GGHSS Akora Khattak NSR
22	MST. DANISH BEGUM MSC (HPE) 17	14.04.1969	MARDAN	28.02.1995	18.02.2003	19.05.2009	23.05.2018	GGHSS Shah Dhand Mardan
23	MST. SUGHRA AFANDI MSC (HPE) 18	01.05.1970	MARDAN	10.10.1995	18.02.2003	15.06.2009	23.05.2018	GGHSS Rustam Khel Mardani.
24	MST. NIGAR AKHTAR MSC (HPE) 19	03.04.1976	MARDAN	30.08.1995	06.06.2005	19.05.2009	23.05.2018	GGHSS Nowshera Cantt.
25	MST. YAHYA BEGUM MSC (HPE) 20	08.06.1973	KARAK	03.10.1995	06.06.2005	24.10.2013	23.05.2018	GG Comprehensive HSS Peshawar City
26	MST. REHANA KHATOON MSC (HPE) 21	01.01.1960	KARAK	18.01.1998	06.06.2005	19.05.2009	23.05.2018	GGHSS Chokara Karak
27	MST. NAHEED GOHAR MSC (HPE) 22	04.03.1969	MANSHERA	17.03.1993	06.06.2005	19.05.2009	23.05.2018	GGHSS Jangal Khel Kohat
28	MST. MUFEEDA BEGUM MSC (HPE) 23	31.08.1971	SWABI	11.12.1990	06.06.2005	16.05.2013	23.05.2018	GGHSS; Shahbaz Garbi Mardan
29	MST. SAMINA AKHTAR MSC (HPE) 24	15.03.1974	KARAK	23.05.1992	06.06.2005	24.10.2013	23.05.2018	GGHSS Pir Pai Nowshera

31-12-18

27

	MST. ASMA QUARSHI MSC (HPE)	21	06.06.1976	PESHAWAR	20.01.1995	06.06.2005	19.05.2009	23.05.2018	GGHSS Lady Grifth Peshawar
31	MST. MUNAZA JABEEN MSC (HP)	22	10.10.1975	PESHAWAR	23.11.1995	06.06.2005	19.05.2009	23.05.2018	GGHSS Tarnab Peshawar
32	MST. AZRA NAZ MSC (HPE)	23	01.02.1970	MARDAN	08.03.1998	06.06.2005	19.05.2009	23.05.2018	GGHSS Toru Mardan
33	MST. GHAZALA NAEEM MSC (HPE)	24	15.02.1966	KONAR	01.01.1988	06.06.2005	19.05.2009	23.05.2018	GGHSS Benzauli Chakarkot Konar
34	MST. SUJHAT BEGUM MSC (HPE)	25	05.09.1972	MARDAN	30.09.1996	06.06.2005	15.06.2009	23.05.2018	GGHSS Takhtbhai Mardan
35	MST. TASLEEM KAUSAR M.SC (HPE)		12.10.1974	MALAKAND	24.05.2006	24.05.2006	16.05.2013	23.05.2018	GGHSS Sakhakot Malakand
36	MST. SAIMA GUL MSC (HPE)	26	28.04.1979	D.I. KHAN	24.05.2006	24.05.2006	15.06.2009	23.05.2018	GGHSS Sherazi No. 8 DI Khan
37	MST. ROHILA GUL MSC (HPE)	27	12.10.1980	BANNU	24.05.2006	24.05.2006	19.05.2009	23.05.2018	GGHSS Koti Sadat Bannu
38	MST. SHAHANA MSC (HPE)	28	05.05.1983	BANNU	24.05.2006	24.05.2006	19.05.2009	23.05.2018	GGHSS Domel Bannu
39	MST. MIARYAM MUSTAFA MSC (PE)	29	27.11.1978	ABBOTTABAD	24.05.2006	24.05.2006	19.05.2009	23.05.2018	RITE (Female) Abbottabad
40	MST. SAIMA ANDALEEB MSC (HP)	30	05.04.1980	HARIPUR	01.09.2004	24.05.2006	19.05.2009	23.05.2018	GGHSS Kot Najibullah Haripur
41	MST. IMTAZ TABASSUM MSC (HP)	31	15.12.1978	PESHAWAR	14.01.1998	24.05.2006	19.05.2009	23.05.2018	GGHSS Jogiwara Peshawar
42	MST. BASREET AFZAL MSC (HPE)	32	20.02.1984	MARDAN	24.05.2006	24.05.2006	13.10.2010	23.05.2018	GGHSS Hathian Mardan.
43	MST. FAKHAR-E-ANJUM MSC (HPE)	33	13.04.1977	MARDAN	14.12.1999	12.12.2006	19.05.2009	23.05.2018	GGHSS Sawal Dher Mardan
44	MST. NIGHAT SEEMA MSC (HPE)	34	05.11.1970	NOWSHERA	13.03.1993	12.12.2006	19.05.2009	23.05.2018	GGHSS Kalu Khan Swabi
45	MST. MARYAM RASOOL MSC (HPE)	35	07.01.1970	HARIPUR	01.09.1993	12.12.2006	24.10.2013	23.05.2018	GGHSS Kalabat Township No,2 Haripur
46	MST. SHAHEEN ALI BA MSC (HPE)	36	12.12.1975	SWABI	04.01.2004	12.12.2006	27.05.2009	23.05.2018	GGHSS Shewa Swabi
47	MST. GUL DARI MSC (HPE)	37	05.01.1962	KARAK	08.11.1979	12.12.2006	24.10.2013	23.05.2018	GGHSS; Ismail Mama Khel Bannu
48	MST. MUSSARJ IQBAL MSC (HPE)	38	08.01.1970	KARAK	13.11.1990	12.12.2006	24.10.2013	23.05.2018	GGHSS; Kotka Bilawar Khan Bannu P.M. = GGHSS Karak
49	MST. SARDAR BIBI MSC (HPE)	39	30.05.1970	KARAK	12.01.1994	12.12.2006	25.10.2011	23.05.2018	GGHSS No.1 Karak
50	MST. SHERAZ TAJ MSC (HPE)	40	09.11.1976	MARDAN	08.01.1996	12.12.2006	19.05.2009	23.05.2018	GGHSS Gujrat Mardan.
51	MST. AFSHEEN MUMTAZ MSC (HPE)	41	23.12.1974	PESHAWAR	20.11.1994	12.12.2006	19.05.2009	23.05.2018	GGHSS Khyber Colony Peshawar
52	MST. SADIA HAZRAT MSC (HPE)	42	05.03.1983	MALAKAND	02.12.2004	12.12.2006	15.06.2009	23.05.2018	GGHSS Kopar Malakand
53	MST. SHAHIDA BEGUM MSC (HPE)	43	15.12.1976	KARAK	17.05.1993	12.12.2006	24.10.2013	23.05.2018	GGHSS Esak Chuntra Karak
54	MST. RAHANA YASMEEN MSC (HPE)	44	30.04.1971	PESHAWAR	17.11.1994	12.12.2006	19.05.2009	23.05.2018	GGHSS Wadpaga Peshawar
55	MST. HUSSAN BASRI MSC (HPE)	45	02.03.1972	PESHAWAR	10.07.1997	12.12.2006	19.05.2009	23.05.2018	GGHSS Sufaid Sung Peshawar.
56	MST. SAIRA ILTAF MSC (HPE)	46	01.01.1981	ABBOTTABAD	26.06.2005	12.12.2006	15.06.2009	23.05.2018	GGHSS Kakul Abbottabad
57	MST. SAJIDA NOUSHEEN MSC (HPE)	47	27.07.1960	PESHAWAR	02.09.1980	12.12.2006	19.05.2009	23.05.2018	GGHSS Begum Shahabuddin Peshawar
58	MST. NAZMA SHAHEEN MSC (HPE)	48	30.05.1977	PESHAWAR	01.10.1996	12.12.2006	16.05.2013	23.05.2018	GGHSS Larama Peshawar
59	MST. ROBINA SHAHEEN MSC (HPE)	49	24.01.1965	MARDAN	04.02.2005	10.02.2009	15.06.2009	23.05.2018	GGHSS Rashakai Nowshera
60	MST. RIFFAT SHAHEEN MSC (HPE)	50	01.03.1967	MANSEHRA	19.02.2004	10.02.2009	15.06.2009	23.05.2018	GGHSS Baffa Mansehra
61	MST. ARIFA SALEEM MSC (HPE)	51	01.09.1972	PESHAWAR	20.10.1993	10.02.2009	15.06.2009	23.05.2018	GGHSS Nishtar Abad Peshawar

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5/11/18

5/11/18

To,

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

Subject: APPLICATION FOR SENIORITY LIST SIPE (FEMALE) GRADE 18.

Respected Sir,

It is stated that we are working in different .. Secondary school of KPK as SIPE the PSB of male SIPE was held last year and for that purpose all the residential were arranged and male category seniority list was issued last year on the basis at which all senior male SIPE got their promotion from Grade 18 to Grade 19.

Sir now PSB for female SIPE promotions from Grade 18 to Grade 19 as due and we were called to arrange our documents in the desired fashion by the authority. All female senior SIPEs have arranged their documents except only one remaining documents (THE SENIORITY LIST).

Sir, we have visited the office of directorate multiple times, for the above mention subject but all in vein. We have been told that it is under process once the PSB of male SIPE it is our right as employee of education department that our seniority list should be issued or time so that we can make arrangements for the coming PSB for female SIPE, KPK.

We humbly request you to issue us the seniority list of Grade 18. We will be highly thankful to you for this act of kindness.

Thanking You,

Sd/-
Imtiaz Tabassum
SIPE GGHSS
Joglwara

Sd/-
Rehana Yasmin
SIPE, GGHSS
Wadpaga


Sd/-
Afsheen Mumtaz
SIPE, GGHSS
Khyber Colony

Sd/-
Hussan Basri
SIPE, GGHSS
Landi Arbab

Dated: 26 August, 2020.

**FINAL SENIORITY LIST OF SENIOR INSTRUCTORS PHYSICAL EDUCATION BS-18 (FEMALE) ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
KHYBER PAKHTUNKHWA AS STOOD 02-03-2021**

S.No	Name of Officer with Academic Qualification	Domicile	Date of Birth	D/O 1st Entry into Govt Service	D/O Apptt: as DPE BS-16 (Regular)	D/O Award of BS-17 (Regular)	Regular Appt/Promotion to the present post			Place of Posting
							D/O Award of BS-18 (Regular)	BPS	Method of recruitment	
1	2	3	4	5	6	7	8	9	10	11
1	MST. SAFINA BAKAR MSC (HPE)	NOWSHERA	06.01.1962	26/08/1990	26/08/1990	19/05/2009	23/05/2018	18	By promotion	GGHSS University Town Peshawar
2	MST. SHAHEEN ANWAR MSC (HPE)	ABBOTTABAD	03.06.1963	24/07/1991	24/07/1991	19/05/2009	23/05/2018	18	By promotion	GGHSS Abbottabad
3	MST. REHANA PARVEEN MSC (HPE)	D.I. KHAN	10.02.1963	24/07/1991	24/07/1991	19/05/2009	23/05/2018	18	By promotion	GGHSS Prova DI Khan
4	MST. SHAHIDA BEGUM MSC (HPE)	NOWSHERA	01.09.1967	07/01/1990	16/05/1997	19/05/2009	23/05/2018	18	By promotion	GGHSS Nowshera Kadan
5	MST. SHABNAM JADOON MSC (HPE)	ABBOTTABAD	05.04.1968	16/05/1997	16/05/1997	19/05/2009	23/05/2018	18	By promotion	GGHSS Dhanpur Abbottabad
6	MST. TAMELLA NAZ MSC (HPE)	D.I. KHAN	31.08.1967	06/03/1990	16/05/1997	19/05/2009	23/05/2018	18	By promotion	R.I.T.E (F) DI Khan
7	MST. NAUREEN ANWAR MSC (HPE)	KOHAT	03.05.1968	16/05/1997	16/05/1997	19/05/2009	23/05/2018	18	By promotion	R.I.T.E (F) Peshawar
8	MST. SAEEDA BEGUM MSC (HPE)	PESHAWAR	01.01.1964	13/03/1986	18/02/2003	19/05/2009	23/05/2018	18	By promotion	GGHSS Chamkani Peshawar
9	MST. MISBAH SEEMA MSC (HPE)	D.I. KHAN	14.05.1964	11/02/1992	18/02/2003	13/10/2010	23/05/2018	18	By promotion	GGHSS Chan Sid Muzawar Shan No. 6 DI Khan
10	MST. RAHILA BANO MSC (HPE)	D.I. KHAN	24.03.1966	31/05/1992	18/02/2003	13/10/2010	23/05/2018	18	By promotion	GGHSS No.5 Qasaban DI Khan
11	MST. RAFIA KHATTAK MSC (HPE)	KARAK	09.09.1967	16/11/1992	18/02/2003	19/05/2009	23/05/2018	18	By promotion	GGHSS Manra Peshawar
12	MST. HAMIDA BAGEM MSC (HPE)	D.I. KHAN	01.01.1967	11/01/1996	18/02/2003	19/05/2009	23/05/2018	18	By promotion	GGHSS No. 9 Dn Par DI Khan
13	MST. ABIDA PARVEEN MSC (HPE) ✓	ABBOTTABAD	20.10.1966	01/10/1992	18/02/2003	15/06/2009	23/05/2018	18	By promotion	GGHSS Malakpura Abbottabad
14	MST. ROBINA SHAHEEN MSC (HPE) ✓	BANNU	02.01.1972	07/11/1992	18/02/2003	15/06/2009	23/05/2018	18	By promotion	GGHSS Sikandar Khel Bala Banna
15	MST. NABILA TABASUM MSC (HPE)	D.I. KHAN	25.04.1970	25/06/1997	18/02/2003	19/05/2009	23/05/2018	18	By promotion	GGHSS No.3 Peshawar Cantt
16	MST. PARVEEN AKHTAR MSC (HPE)	MARDAN	15.11.1966	15/11/1984	18/02/2003	24/10/2013	18/04/2019	18	By promotion	GGHSS Akora Khattak NSR
17	MST. DANISH BEGUM MSC (HPE)	MARDAN	14.04.1969	28/02/1995	18/02/2003	19/05/2009	23/05/2018	18	By promotion	GGHSS Shah Dhand Mardan
18	MST. SUGIRA AFANDI MSC (HPE) ✓	MARDAN	01.05.1970	10/10/1995	18/02/2003	15/06/2009	23/05/2018	18	By promotion	GGHSS Rastam Khel Mardan
19	MST. YAHYA BEGUM MSC (HPE)	KARAK	08.06.1973	03/10/1995	06/06/2005	24/10/2013	18/04/2019	18	By promotion	GGHSS Pir Pai Nowshera
20	MST. NIGAR AKHTAR MSC (HPE)	MARDAN	03.04.1976	30/08/1995	06/06/2005	19/05/2009	23/05/2018	18	By promotion	GGHSS Shida Nowshera
21	MST. NAHEED GOHAR MSC (HPE)	MANSEERA	04.03.1969	17/03/1993	06/06/2005	19/05/2009	23/05/2018	18	By promotion	GGHSS Jangal Khel Kohat
22	MST. MUFEEDA BEGUM MSC (HPE)	SWABI	31.08.1971	11/12/1990	06/06/2005	16/05/2013	05/11/2018	18	By promotion	GGHSS, Shahar Garhi Mardan
23	MST. SAMINA AKHTAR MSC (HPE)	KARAK	15.03.1974	23/05/1992	06/06/2005	24/10/2013	18/04/2019	18	By promotion	GGHSS Peshawar City
24	MST. ASMA QUARSHI MSC (HPE)	PESHAWAR	06.06.1976	20/01/1995	06/06/2005	19/05/2009	23/05/2018	18	By promotion	GGHSS Lach Grib Peshawar
25	MST. MUNAZA JABEEN MSC (HPE)	PESHAWAR	10.10.1975	23/11/1995	06/06/2005	19/05/2009	23/05/2018	18	By promotion	GGHSS Tamah Peshawar
26	MST. AZRA NAZ, MSC (HPE)	MARDAN	01.02.1970	08/03/1998	06/06/2005	19/05/2009	23/05/2018	18	By promotion	GGHSS Teru Mardan
27	MST. GHAZALA NAEEM MSC (HPE)	KOHAT	15.02.1968	01/01/1988	06/06/2005	13/10/2010	23/05/2018	18	By promotion	GGHSS Behzad Chakarkot Kohat
28	MST. SUJHAT BEGUM MSC (HPE) ✓	MARDAN	05.09.1972	30/09/1996	06/06/2005	15/06/2009	23/05/2018	18	By promotion	GGHSS Taljibhai Mardan
29	MST. BASKEET AFZAL MSC (HPE)	MARDAN	20.02.1984	27/05/2006	27/05/2006	13/10/2010	23/05/2018	18	By promotion	GGHSS Hishan Mardan
30	MST. ROHILA GUL MSC (HPE)	BANNU	12.10.1980	27/05/2006	27/05/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Kori Sadat Banna


 Deputy Director (P&A)
 Elementary & Secondary Education
 Khyber Pakhtunkhwa Peshawar

31	MST. SAIMA ANDALEEB MSC (HPE)	HARIPUR	05.04.1980	01/09/2004	27/05/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Koc Najibullah Haripur
32	MST. SHAHANA MSC (HPE)	BANNU	05.05.1983	27/05/2006	27/05/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Domel Bannu
33	MST. IMTAZ TABASSUM MSC (HPE)	PESHAWAR	15.12.1978	14/01/1998	27/05/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Jogiwar Peshawar
34	MST. SAIMA GUL MSC (HPE)	D.I. KHAN	26.04.1979	27/05/2006	27/05/2006	15/06/2009	23/05/2018	18	By promotion	GGHSS Sherazi No. 8 DI Khan
35	MST. TASLEEM KAUSAR MSC (HPE)	MALAKAND	12.10.1974	27/05/2006	27/05/2006	16/05/2013	05/11/2018	18	By promotion	GGHSS Sakhakar Malakand
36	MST. MARYAM MUSTAFA MSC (HPE)	ABBOTTABAD	27.11.1978	27/05/2006	27/05/2006	19/05/2009	23/05/2018	18	By promotion	RITE (Female) Abbottabad
37	MST. FAKHAR-E-ANJUM MSC (HPE)	MARDAN	13.04.1977	01/12/1999	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Sawal Dher Mardan
38	MST. NIGHAT SEEMA MSC (HPE)	NOWSHERA	05.11.1970	13/03/1993	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Kulu Khan Swabi
39	MST. MARYAM RASOOL MSC (HPE)	HARIPUR	07.01.1970	01/09/1993	12/12/2006	24/10/2013	18/04/2019	18	By promotion	GGHSS Kadir Town No.2 Haripur
40	MST. SHAHEEN ALI MSC (HPE)	SWABI	12.12.1975	04/01/2004	12/12/2006	27/05/2009	23/05/2018	18	By promotion	GGHSS Shera Swabi
41	MST. MUSSARJ IQBAL MSC (HPE)	KARAK	08.01.1970	13/11/1990	12/12/2006	24/10/2013	18/04/2019	18	By promotion	GGHSS Esak Chutra Karak
42	MST. SARDAR BIBI MSC (HPE)	KARAK	30.05.1970	12/01/1994	12/12/2006	25/10/2011	23/05/2018	18	By promotion	GGHSS No.1 Karak
43	MST. SHEERAZ TAJ MSC (HPE)	MARDAN	09.11.1976	08/01/1996	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Gujrat Mardan
44	MST. AFSHEEN MUMTAZ MSC (HPE)	PESHAWAR	23.12.1974	20/11/1994	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Khyber Colony Peshawar
45	MST. SADIA HAZRAT MSC (HPE)	MALAKAND	05.03.1983	02/12/2004	12/12/2006	15/06/2009	23/05/2018	18	By promotion	GGHSS Kejar Malakand
46	MST. SHAHIDA BEGUM MSC (HPE)	KARAK	15.12.1976	17/05/1993	12/12/2006	24/10/2013	18/04/2019	18	By promotion	GGHSS Esak Chutra Karak
47	MST. RAHANA YASMEEN MSC (HPE)	PESHAWAR	30.04.1971	17/11/1994	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Wadpaga Peshawar
48	MST. HUSSAN BASRI MSC (HPE)	PESHAWAR	02.05.1972	10/07/1997	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Landi Arab Peshawar
49	MST. SAIRA ILTAF MSC (HPE)	ABBOTTABAD	01.01.1981	26/06/2005	12/12/2006	15/06/2009	23/05/2018	18	By promotion	GGHSS Kakul Abbottabad
50	MST. NAZMA SHAHEEN MSC (HPE)	PESHAWAR	30.05.1977	01/10/1996	12/12/2006	16/05/2013	05/11/2018	18	By promotion	GGHSS Lurama Peshawar
51	MST. ROBINA SHAHEEN MSC (HPE)	MARDAN	24.01.1965	04/02/2005	10/02/2009	15/06/2009	23/05/2018	18	By promotion	GGHSS Rashakai Nowshera
52	MST. RIFFAT SHAHEEN MSC (HPE)	MANSEHRA	01.03.1967	19/02/2004	10/02/2009	15/06/2009	23/05/2018	18	By promotion	GGHSS Baffa Manshera
53	MST. ARIFA SALEEM MSC (HPE)	PESHAWAR	01.09.1972	20/10/1993	10/02/2009	15/06/2009	23/05/2018	18	By promotion	GGHSS Nishtar Abad Peshawar

Certificate:-

- 1 That the Seniority list is widely circulated.
- 2 That the Seniority list is undisputed/uncontroversial.
- 3 That there is no litigation pending/involved.

Deputy Director (F & A)
 Elementary & Secondary Education
 Khyber Pakhtunkhwa



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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-A Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9221111

Dated Peshawar the, October 26th 2021

NOTIFICATION

NO:SO(S/F)/E&SE/4-24/2021/Final Seniority (List of SIPEs (BS-18)) In exercise of powers conferred under Sub-Section (1) of Section 8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973), the Final Seniority List of the Senior Instructors Physical Education (BS-18), Elementary & Secondary Education, Khyber Pakhtunkhwa as stood on 02-03-2021 is hereby notified for information of all concerned.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst. of even No. & date:

Copy forwarded for information to the:-

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
2. Director, Curriculum & Teachers Education, Khyber Pakhtunkhwa, Abbottabad.
3. Director, Directorate of Professional Development (DPC), Khyber Pakhtunkhwa Peshawar.
4. Director EMIS, E&SE Department.
5. All District Education Officer (Female) in Khyber Pakhtunkhwa.
6. PS to Secretary, E&SE Department.
7. Master File.

(HAFEZ UR REHMAN)
SECRETARY (S/F)

Secretary
Government of Khyber Pakhtunkhwa,
Elementary and Secondary Education Department
Block-A, Opp: MPAs Hostel, Civil Secretariat
Peshawar.

Subject: DEPARTMENTAL REPRESENTATION AGAINST THE
NOTIFICATION NO.SO(S/F)E&SE./4-24/2021/ FINAL
SENIORITY LIST OF SIEPs (BS-18) DATED 26.10.2021.

Respected Sir,

- 1) That the appellant is serving as Senior Instructor Physical Education (female) in the Elementary and Secondary Education Department, Govt. of KP.
- 2) That the department vide order dated 26.10.2021 vide the above notification issued a seniority list of the incumbents of the department a seniority list as stood on 02.03.2021.
- 3) That the appellant being senior and eligible to be considered as senior to the other incumbents of the department whose are stood senior vide the seniority list at S.No.5, 10, 11, 13, 18, 21, 24, 25, 29, 31, 37, 41, 43 and 44 are considered and stood senior to the appellant.
- 4) That the instant seniority list is illegal, against law and against the facts and the policy of the department in regard to seniority of the appellant.
- 5) That the appellant is senior by virtue of education, qualification, date of initial appointment and date of promotion to BPS-17 against the mentioned incumbents which are stood senior to the appellant as per seniority list.
- 6) That the instant seniority list issued by the department the mentioned incumbents are illegally ranked and stood senior to the appellant which is violation of law and rules and policy on the subject.
- 7) That the instant seniority list is also the violation of case law and judgments of the Khyber Pakhtunkhwa Services Tribunal, Peshawar in respect of the appellant as well as other incumbents.

Diary No.	4135
Dated:	1-11-2021

It is, therefore, prayed that notification dated 26.10.2021 may please be modified to the extent of undersigned and corrigendum may kindly be issued in respect of the said incumbents as per law and rules and the appellant be ranked and be corrected as senior.

Any other relief which deems appropriate in the circumstances of the case may kindly also be granted.

Yours Sincerely



Mrs. Afsheen Mumtaz
Govt. Girls Higher Secondary School
Khyber Colony, Peshawar
Senior Instructor Physical Education
(female) in the Elementary and Secondary
Education Department, Govt. of KP.
CNIC No. 17301-3947269-4
Cell: 0333-9113375

Dated: 29.10.2021

یعدالت چیمپا سروس ٹریڈنگ کمپنی پشاور

مخواب ایڈوانس

مقام آفیس چیمپا سروس ٹریڈنگ کمپنی پشاور

دعویٰ اپیل

باعتبار اس کے لئے

مسترد شدہ جہیز خان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام پشاور کیسٹل سٹول انڈیا خان سروسٹے ایڈوانس ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موقوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو کرنے والی نامہ و اقرار ثالثہ و فیصلہ بر خلاف اپنے جواب دہی اور اقبال دعویٰ اور لیکچرنگ ڈگری کرنے اور دوسری چیمک و روپیہ اور مرضی دعویٰ اور درخواست ہر قسم کی تقدیر اور اس پر دستخط کرنے کا اختیار ہوگا نیز لیکچرنگ عدم پیروی یا ڈگری بکلیفہ یا اپیل کی برآمدگی اور مقررہ فیصلہ یا ڈگری کرنے اپیل ٹرانسپیرانٹ و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور ضرورت مقدمہ بنا کر کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور وہ اپنے مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساتھ پر و اختہ منطوقہ قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التوا مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب موقوف ہوں گے نیز لیکچرنگ و فرسبہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام رورہ پر ہو یا مدت باہر ہو تو وکیل صاحب یا ہمارے نمائندہ ہوں گے کہ پیروی اند کو کر دیں۔

لہذا وکالت نامہ دیکھ دیا کہ مستند ہے۔

الرقوم ۲۲-۵۶-۱۵

العبد العبد العبد

۱۱
ارباب سینگ انکمال
ایڈووکیٹ

سید الشہدائے حق
ایڈووکیٹ

محمد نواز
ایڈووکیٹ

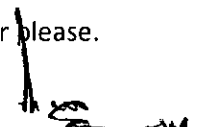


احمد رضا مختار


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 233/2022 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/02/2022	<p>The appeal of Mst. Afsheen Mumtaz resubmitted today by Mr. Saadullah Khan Marwat 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</p>
2-	05.04.2022	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>05-04-2022</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>None present for the appellant.</p> <p>Notices be issued to appellant as well as her counsel for the date fixed. To come up for preliminary hearing on 12.05.2022 before the S.B.</p> <p style="text-align: right;"> Chairman</p>

Dr
Afsheen


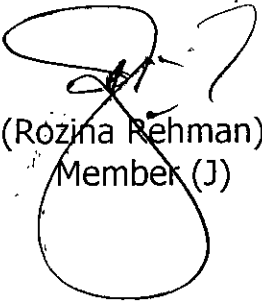
12.05.2022

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections with direction to appellant to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for reply/comments. To come up for written reply/comments on 19.07.2022 before S.B.

Rs-2400/-
Appellant's
Security & Process Fee

Aff with
23/5/22



(Rozina Rehman)
Member (J)