

22.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 18.05.2022 for the same as before.


Reader

18.05.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Written reply/comments on behalf of respondents not submitted. Learned AAG seeks time to contact the respondents for submission of written reply/comments. Granted. To come up for preliminary ^{hearing} as well written reply/comments on 22.07.2022 before S.B.


(Mian Muhammad)
Member (E)

13.12.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant is aggrieved of the notification dated 27.12.2018 whereby she was promoted from the post of PST (BS-12)/SPST(BS-14) (female) to the post of PSHT (BS-15) with immediate effect. Precedents have been quoted of notifications dated 05.07.2016 and 05.12.2016 where-under such employees had been promoted with retrospective effect i.e 01.07.2012. The appellant preferred departmental appeal on 06.05.2021 which was not responded withⁱⁿ the stipulated statutory period, where-after the instant service appeal was filed in the Service Tribunal on 03.09.2021. Learned counsel was confronted with two basic questions;

(a) Whether promotion is ordered with immediate effect or with retrospective effect, as per Khyber Pakhtunkhwa Civil Servants Act, 1973, Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) rules 1989 and service rules of the respondent-department?

(b) There is a gap of 2-1/2 years between the impugned notification issued and the departmental appeal submitted against the impugned order. How can this limitation period be counted and justified because there is no application for condonation of delay attached/submitted with the service appeal? He replied that it is a "recurring and continues cause" against which limitation does not run. Let pre-admission notice be issued to the official respondents to submit their reply/parawise comments and assist the Tribunal. Adjourned. To come up for preliminary hearing on 22.02.2022 before S.B.

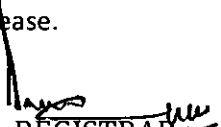


(Mian Muhammad)
Member(E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7557 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/10/2021	<p>The appeal of Mst. Noor Shad Begum resubmitted today by Mr. Ashraf Ali Khattak 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> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>13/12/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal of Mst. Noor Shad Begum, PST, GGPS, District Karak presented today i.e. on 03.09.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Certificate be given to the effect that the appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.
- 2- Check list is not attached with the appeal.
- 3- In all documents the name of the appellant may be highlighted.
- 4- Annexure G of the appeal is illegible which may be replaced by legible/better one.


No. 1740 /S.T,

Dt. 03/09 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Ashraf Ali Khattak AHC.

Objection attended, please place before
The Honourable Tribunal.


Ashraf Ali Adv.
7/10/21

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: _____

S#	CONTENTS	YES	NO
1	This Appeal has been presented by <u>Ashraf Ali</u>	✓	
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?	✓	
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?	✓	
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: Ashraf Ali
 Signature: [Signature]
 Dated: 7/10/21

BEFORE THE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL, PESHAWAR

Service Appeal No. 7557/2021

Mst: Noor Shad Begum,
W/o Ahmad Nawaz;
PST, GGPS, Karak Sar;
Karak City.....Petitioner

Versus

The Secretary Education,
(E & SE) Govt: of KPK;
Civil Secretariat,
Peshawar and others and othersRespondents

INDEX

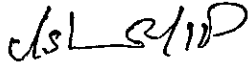
S.No.	Description of Documents	Date	Annexure	Pages
1.	Service Appeal with Affidavit			1-6
2.	Copy of appointment order	19-05-2004	A	7
3.	Copy of regularization order	01-11-2005	B	8-9
4.	Coy order Endst: No.934-38 dated 19-11-2015, thereby the post of appellant was up-graded from BPS-07 to BPS-09 with effect from 01-10-2007	19-11-2015	C	10
	Copy of extract of service book thereby appellant was further up-graded from PBS-09 to BPS-12 with effect from 01-07-2012 in pursuance of the Notification No.FS/SO/Edu/SSD No.2882-94 Dated, Peshawar 22-06-2016 and DE FATA No.8233-60 dated 08-08-2016 vide AEO No.1138-43 dated 11-11-		D	11-12
	impugned 27-12-		E	13-22

S.No.	Description of Documents	Date	Annexure	Pages
	<p>2018 thereby appellant was in pursuance of the Elementary & Secondary Education Department Khyber Pakhtunkhwa Notification No. (B & A)/1-18/E & SE: 2021 dated 11-07-2012 and issued by Finance Department (Regulation Wing), Islamabad vide Endst: No.1(32)R-1/2015-592-2016 dated 28-07-2016 and Directorate of Education (FATA) Endst: No.8233-60 dated 08-08-2016; appellant was promoted to the post of PSHT (BPS-15) by the competent authority with immediate effect.</p>			
7.	<p>Copy of extract from service book thereby appellant promotion was endorsed thereby appellant promotion entry was further endorsed in her service book.</p>		F	23-24
8.	<p>Copy of orders whereby colleagues and junior to the appellant have been promoted to BPS-14 and 15 vide Notification Endst: No.1381-85/Ptc/ (F) dated</p>		G	25-27

S.No.	Description of Documents	Date	Annexure	Pages
	05-12-2016.			
9.	Copy of Notification Endst: 1376/ 80/Ptc (F) dated 05-12-2016 thereby other colleagues and juniors to appellant were promoted to the post of PSHT (BPS-15) with effect from 01-07-2012.		H	28-29
10.	Copy of departmental appeal		I	30-34
11.	Wakalat Nama.			35


Petitioner

Through


Ashraf Ali Khattak
Advocate,
High Court, Peshawar

Dated ___ / ___ /2020

1

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2021

**Mst: Noor Shad Begum,
W/o Ahmad Nawaz;
PST, GGPS, Karak Sar;
Karak CityAppellant.**

Versus

1. The Govt: of Khyber Pakhtunkhwa,
Through Chief Secretary'
Civil Secretariat, Peshawar.
2. The Secretary Education,
(E & SE), Department,
Civil Secretariat, Peshawar.
3. The Director Education (E & SE),
Govt: of Khyber Pakhtunkhwa;
Peshawar.
4. The Deputy Director (Estt:);
Merged Areas, Education Directorate;
Peshawar
5. The District Education Officer (F);
District North Waziristan;
Meranshah.
6. The District Education Officer (F),
District, KarakRespondents.

**Service Appeal under section 4 of the Khyber Pakhtunkhwa
Service Tribunal Act, 1974 against the impugned order of
promotion ^{passed} by respondent No.5; dated 27-12-2017, thereby
appellant was promoted to the post of PSHT (BPS-15) with**

immediate effect and against which appellant filed departmental appeal, which is still pending without disposal.

Prayer:-

On acceptance of the instance service appeal; this Honourable Tribunal may graciously be pleased to:-

- i. Declare impugned order of promotion dated 27-12-2018 to the extent of Serial No.43 (appellant) passed by the respondent No.5; wherein she promoted the appellant to the post of PSHT (BPS-15) with immediate effect as illegal, unlawful and without lawful authority; and whereas appellant was entitle to be promoted to the post of PSHT with effect from the date of 1ST Notification No.(B & A)/1-18/E &SE, 2012 dated 11-07-2012.**
- ii. Direct the respondents to promote the appellant to the post of SPST (BPS-14) and PSHT (BPS-15) with effect from the date of 1ST Notification No.(B & A)/1-18/E &SE, 2012 dated 01-07-2012 with all back benefits, so as to bring the appellant at par with her others colleagues and junior to her, who have been promoted as such with effect from 11-07-2012.**
- iii. Any other relief not asked for but deemed appropriate under the circumstances the case may also be graciously granted.**

Respectfully Sheweth,

The concise facts giving rise to the present writ petition are as under:-

1. That appellant was enrolled as PTC (BPS-07) vide order dated 19-05-2004 (Annexure-A) through prescribed procedure and posted at

GGPS Jahangir Kot Spulga; District North Waziristan. She has got 17 years service at her credit with unblemished and clean sheeted conduct record.

2. That the services of the appellant was regularized vide order dated 01-11-2005 (**Annexure-B**) with effect from the date of her 1st appointment i.e 19-05-2004 in the light and pursuance of the Judgment/Order of the Hon'ble Peshawar High Court and Supreme Court of Pakistan.
3. That later on vide order Endst: No.934-38 dated 19-11-2015, the post of appellant was up-graded from BPS-07 to BPS-09 with effect from 01-10-2007 (**Annexure-C**).
4. That appellant was further up-graded from PBS-09 to BPS-12 with effect from 01-07-2012 in pursuance of the Notification No.FS/SO/Edu/SSD No.2882-94 Dated, Peshawar 22-06-2016 and DE FATA No.8233-60 dated 08-08-2016 vide AEO NWA No.1138-43 dated 11-11-2016 as evident from the extract of Service Book (**Annexure-D**).
5. That in pursuance of the Elementary & Secondary Education Department Khyber Pakhtunkhwa Notification No. (B & A)/1-18/E & SE: 2021 dated 11-07-2012 and issued by Finance Department (Regulation Wing), Islamabad vide Endst: No.1(32)R-1/2015-592-2016 dated 28-07-2016 and Directorate of Education (FATA) Endst: No.8233-60 dated 08-08-2016; appellant was promoted to the post of PSHT (BPS-15) by the competent authority. Appellant lies at serial No.43 of the Notification (**Annexure-E**). The order was further endorsed by respondent No.4 vide Endst No.13107-13 dated 27-12-2018 as evident from the extract of Service Book. The pay of the appellant was also fixed in BPS-15 accordingly. (**Annexure-F**).
6. That it is worth mentioning that colleagues and junior to the appellant have been promoted to BPS-14 and 15 vide Notification Endst: No.1381-85/Ptc/ (F) dated 05-12-2016 (**Annexure-G**) and

Notification Endst: 1376/ 80/Ptc (F) dated 05-12-2016 (Annexure-H) with effect from 01-07-2012.

7. That that appellant was entitle to be promoted to BPS-14 and then to BPS-15 with effect from 01-07-2012 but she was promoted to BPS-15 with immediate effect i.e with effect from 27-12-2018 and whereas her other colleagues were promoted with effect from the date of original Notification dated 01-07-2012.
8. That appellant being aggrieved from order of her promotion to the extent of immediate effect; preferred departmental appeal (Annexure-I), which is still pending without disposal, hence the statutory period has elapsed, therefore, the instant service appeal inter alias on the following grounds.

Grounds

- A. That appellant has not been treated by the respondents in accordance with law, rules and policy on the subject and acted in violation of Article 4, 10A of Constitution of Pakistan, 1973. The Provincial Govt: of Khyber Pakhtunkhwa Vide Elementary & Secondary Education Department Khyber Pakhtunkhwa Notification No. (B & A)/1-18/E & SE: 2021 dated 11-07-2012 upgraded/promoted the post of PST (BPS-12)to the post of SPST (BPS-14) and PSHT (BPS-15) with immediate effect. The same Notification was adopted by merged district as evident from the impugned promotion order of appellant dated 27-12-2018 and promotion order annexed as annexure-g and h (Endst: No.1381-85/Ptc/ (F) dated 05-12-2016 and Notification Endst: 1376/ 80/Ptc (F) dated 05-12-2016. Appellant was senior member of her cadre therefore was entitled to be promoted along with her others colleagues, but she was deprived and whereas junior to her were promoted and more astonishingly appellant was promoted with effect from 27-12-2018 i.e with immediate effect. This need correction and interference of this Hon'ble Tribunal.
- B. That appellant has been highly discriminated. Colleagues and junior to the appellant have been promoted to the post of PSHT

(BPS-15) prior to the appellant and more so with effect from the date of original notification i.e 01-07-2012 and whereas appellant has been promoted/up-graded to the post of PSHT (BPS-15) with immediate effect i.e from the date of impugned order dated 27-12-2018. Appellant is entitled to be treated at par with her colleagues and juniors.

- C. That total numbers of Primary schools in the in District South Waziristan Agency were 361 at the relevant time and whereas as per formula drawn by the respondent department; there shall be one PSHT in each school, hence means that there were 361 vacancies of PSHT available in the District South Waziristan at the relevant time. It is settled principle of law that right of promotion accrues from the time, when vacancy in civil servant cadre/post is available. On this score as well appellant was entitled to be promoted to the higher post along with her other colleagues.
- D. That public function is in the nature of trust and public functionaries must act as repository to such trust. In the instant case respondents have violated the origin of their public liability/responsibility, which cannot be ignored particularly in case where civil servant has been deprived of his fundamental right of consideration for promotion.
- E. That appellant would like to seek the permission of this Honorable Tribunal to submit other grounds at the time of hearing.

It is therefore, humbly prayed that on acceptance of this service appeal, this Hon'ble Tribunal may be pleased to allow the service appeal as prayed for above.


Appellant

Through

Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

Dated: ___/___/2021

6

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. ____/2021

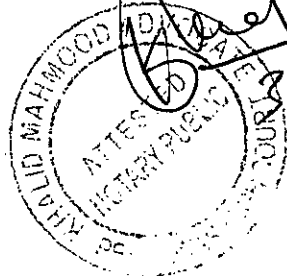
**Mst: Noor Shad Begum,
W/o Ahmad Nawaz;
PST, GGPS, Karak Sar;
Karak City.....Petitioner**

Versus

**The Director Education,
(E & SE) Govt: of KPK;
Peshawar and others and othersRespondents**

AFFIDAVIT

I, Mst: Noor Shad Begum, W/o Ahmad Nawaz; PST, GGPS, Karak Sar; Karak City, do hereby solemnly affirm and declare on oath that the contents of this service appeal are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Tribunal.




Deponent

Anx-A

7

Annex-A

OFFICE OF THE AGENCY EDUCATION OFFICER, NORTH WAZIRISTAN AGENCY.
APPOINTMENT ORDER.

Consequent upon the approval of Departmental Selection Committee the following Non Local Female P.T.C candidates are hereby appointed against P.T.C Posts in BPS - 7 (Rs. 2220-170-5520) PM, plus usual allowances as admissible under the rules, purely on contract basis for three years with effect from their taking over charge against vacant posts noted against each.

S.No	Name of Candidate/Father Name	Name of School where Posted	Remarks
1	Zubida Ghani D/O Amal Ghani	GGPS Ayub Kot Dossali	Against Vacant Post
2	Shamim Akhtar D/O Khial Badshah	Do	Do
3	Farhat-un-Nisa D/O Nek Nawaz	GGPS Kajir Kot Razmak	Do
4	Tallat Kausar D/O Aslam Zada	Do	Do
5	Mamoon Akhtar D/O Mohammad Zubair	FCS Mashal Kot	Do
6	Gul Taj Bibi D/O Bahram Shehzada	FCS Pasham Kot Razoni	Do
7	Kalsum Akhtar D/O Zar Bad Shah	GGPS Fagir Mittari	Do
8	Falak Naz D/O Gul Bostan	Do	Do
9	Noor Shad Begum D/O Rehmat Gul	GGPS Jehandear Kot Spulga	Do
10	Saeeda Akhtar D/O Said Nawaz	GGPS Shakir Jan Kot Shewa	Do
11	Nahid Feroz D/O Noor Jamal	GGPS Gul Zaray Tall Village	Do
12	Farhat Yasmin D/O Mohammad Younas	GGPS Pir Rehman Kot Khushali	Do
13	Razia Naz D/O Mohammad Israr	GGPS Abas Khan Kot Spinwam	Do
14	Zartaj Begum D/O Sher Afzal	GGPS Allama Gul Kot Padami Killa	Do
15	Sakina Sadiq D/O Ghulam Sadiq	FCS Awac Kot Spinwam	Do
16	Rifat D/O Allam Khan	Do	Do
17	Farida Khanum D/O Noor Mohammad	FCS Lala Zaman Kot Khattai Killa	Do

TERMS AND CONDITION.

1. Their appointment are being made purely on CONTRACT basis and liable to termination at any time without any notice, if wish to resign from their posts, they should give one month prior notice or forfeit one month of pay in lieu thereof.
2. They should not be handed over charge of the same post if they are below 18 years or above 33 years age.
3. They should produce their health and age certificate from the Medical Superintendent Agency Head Quarter Hospital Miranshah.
4. Their original qualifications, date of birth and domicile certificate should be checked and photo copy be placed on the record, before handed over charge of the same posts.
5. If they fail to resume their charge within 15 days, the order should be treated as cancelled.
6. Their academic / Professional certificates will be referred to all concerned Boards / Universities (by depositing usual fee charges) for necessary verification till the receipt their certificates, the salary will not be drawn.
7. TA / DA is not allowed.
8. They should produce their NIC to the AAEO circle concerned.
9. Charge report should be submitted in duplicate to all concerned.
10. They will be terminated if they found absent two days continuously from the date of taking over charge.

Agency Education Officer,
North Waziristan Agency.

Ends No.

2558-83
A.E.O/ N.W.A/ Appt: /PTC/ Shawal

Dated 19/5/04

COPY TO :-

1. The Director of Education (FATA) Governor's Secretariat Peshawar.
2. The Political Agent North Waziristan Agency Miranshah.
3. The assistant Political Officer North Waziristan Agency Miranshah.
4. The Agency Accounts officer North Waziristan Agency Miranshah..
5. A.A.E.O circle concerned.
6. Accountant Local Office.
7. Head Teachers concerned.
8. Candidates concerned.

Agency Education Officer,
North Waziristan Agency.

Attested by

ATTESTED

Attested

Paul

Not sure

7

BETTER COPY

OFFICE OF THE AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY

APPOINTMENT ORDER.

Consequent upon the approval of departmental selection committee the following Non local female PTC candidates are hereby appointed against PTC posts in BPS-7 (Rs. 220-120-5820) PM plus usual allowances as admissible under the rules, purely on contract basis for three years with effect from their taking over charges against vacant posts noted against each.

S.No.	Name of Candidate/Father Name	Name of School where posted	Remarks
1.	Zubida Ghani D/o AMal Ghani	GGPS Ayub Kot Dossali	Against vacant post
2.	Shamim Akhtar D/o Khial Badshah	Do	Do
3.	Farh-un-Nisa D/o Nek Nawaz	GGPS Kajir Kot Razmak	Do
4.	Tallat Kausar D/o Aslam Zada	Do	Do
5.	Mamoon AKhtar D/o Mohammad Zubair	FCS Mashal Kot	Do
6.	Gul Taj Bibi D/o Baharam Shehzada	FCS Pasham Kot Razoni	Do
7.	Kalsum Akhtar D/o Zar Badh Shah	GGPS Faqir Mittari	Do
8.	Falak Naz D/o Gul Bostan	Do	Do
9.	Noor Shad Begum D/o Rehmat Gul	GGPS Jehangeer Kot Spulga	Do
10.	Saeeda Akhtar D/o Said Nawaz	GGPS Shakin Jan Kot Shewa	Do
11.	Nahid Feroz D/o Noor Jamal	GGPS Gul Zaray Tall Village	Do
12.	Farhat Yasmin D/o Mohammad Younas	GGPS Pir Rehman Kot Khushal	Do
13.	Razia Naz D/o Mohammad Israr	GGPS Abas Khan Kot SPinwam	Do
14.	Zartaj Begum D/o Sher Afzal	GGPS Alam Gul Kot Padami Killa	Do
15.	Sajdna Sadiq D/o Ghulam Sadiq	FCS Awood Kot Spinwam	Do
16.	Rifat D/o Altam Khan	Do	Do
17.	Farida Khanum D/o Noor Mohammad	FCS Laiq Zaman Kot Khattai Kalla	Do

TERMS AND CONDITIONS

1. Their appointment are being made purely on contract basis and liable to termination at any time without any notice, if wish to resign from their posts, they should give one month prior notice or forfeit one month of pay in lieu thereof.
2. They should not be handed over charge of the same post if they are below 18 years or above 33 years age.
3. They should produce their health and age certificate from the Medical Superintendent Agency Head Quarter Hospital Miranshah.
4. Their original qualifications, date of birth and domicile certificate should be checked and photo copy be placed on the record, before handed over charge of the same posts.
5. If they fail to resume their charge within 15 days, the order should be treated as cancelled.
6. Their academic/professional certificates will be referred to all concerned Boards/universities (By depositing usual fee charges) for necessary verification till the receipt their certificates, the salary will not be drawn.
7. TA/DA is not allowed.
8. They should produce their NIC to the AAEO circle concerned.
9. Charge report should be submitted in duplicate to all concerned.
10. They will be terminated if they found absent two days continuously from the date of taking over charge.

Agency education officer

North Waziristan Agency.

Endst No. 2558-83/A.E.O/N.W.A.Apptt/PTC/Shawal

Dated 19.05.04

Copy to:

1. The Director of Education (FATA) Governor's Secretariat, Peshawar
2. The Political Agent North Waziristan Agency Miranshah.
3. The Assistant Political officer North Waziristan Agency Miranshah
4. The Agency Accounts Officer North Waziristan Agency Miranshah.
5. A.A.E.O Circle concerned.
6. Account Local Office.
7. Head Teachers concerned.
8. Candidates concerned.

ATTESTED

Anx-B

(2) (8)

NO. 18725/805
DATED 10/13/2005

Subject:

IMPLEMENTATION OF HONOURABLE PESHAWAR HIGH COURT/
SUPREME COURT OF PAKISTAN DECISION AND GOVT. OF NWFP
E & AD. DEPARTMENT NOTIFICATION REGARDING CONTRACT
POLICY

Memo:

As per decision of Honourable High Court Peshawar/
Supreme Court of Pakistan in various write petition against contract
policy as well as the Govt. of NWFP, E & AD. Department Notification
18725/11/1-13/2005, dated 10-8-2005, the candidate who were
appointed the result of advertisement published before the introduc-
tion of contract policy i.e 1/7/2001, are hereby regularized with
effect from the date of their appointments.

Entries to this effect should be made in their service
books under intimation to this Directorate without loss of time.

This may be treated as most urgent being a court
matter.

BY: DIRECTOR OF EDUCATION
PATA, NWFP, PESHAWAR

Ends: No. 18906-507

Copy for information and necessary action to the
Honourable Peshawar High Court for information with the request
that the case regarding contract appointment may not be
admitted in favour of recruit policy and in case of previous
admission/policy the same may be dismissed.
Advocate General, NWFP, Peshawar
Advocate General, NWFP, Peshawar
Advocate General, NWFP, Peshawar
Advocate General, NWFP, Peshawar
Advocate General, NWFP, Peshawar
Advocate General, NWFP, Peshawar
Advocate General, NWFP, Peshawar
Advocate General, NWFP, Peshawar
Advocate General, NWFP, Peshawar
Advocate General, NWFP, Peshawar

Attested by
*

ATTESTED

most/urgent

8
BETTER COPY

DIRECTORATE OF EDUCATION

FATA, NWFP, PESHAWAR

No. 18795-805

Dated Peshawar the 01.11.2003

All the AEOs in FATA.

Subject: **IMPLEMENTATION OF HONORUABLE
PESHAWAR HIGH COURT/SUPREME COURT OF
PAKISTAN DECISION AND GOVERNMENT OF
NWFP E&AD DEPARTMENT NOTIFICATION
REGARDING CONTRACT POLICY.**

Memo:

As per decision of Hon'ble High court Peshawar/Supreme court of Pakistan in various write petition against contract policy as well as the government of NWFP, E&AD department notification No. E&AD/VI/1-13/2005 dated 10.8.2005, the candidate who were appointed the result of advertisement published before the introduction of contract policy i.e. 01.7.2001, are hereby regularized with effect from the date of their appointments.

Entries of this effect should be made in their service books under intimation to this directorate without loss of time.

This may be treated as most urgent being a court matter.

**Dy: Director of education
FATA, NWFP, Peshawar**

Endst No. 18806-907/


Copy for information and necessary action to the:

1. Registrar Peshawar High court for information with the request that the case regarding contract appointment may not be admitted in light of recent policy and in caes of previous appeal/petition the same may be dismissed.
2. Advocate General NWFP for similar action please.
3. Registrar Service Tribunal, NWFP for similar action please.
4. All the principals/Headmasters concerned in FATA.
5. All AEOs in FATA.
6. Accountant General, NWFP, Peshawar.

ATTESTED

9

(9)

8	9	10	11	12	13		14	15
Signature and name of the head of the office or other attesting officer of class 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debitable to another Government		Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants
دستخط سرکاری ملازم	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی تبادلہ یا برطرفی	دستخط افسر مجاز	رضعت کی نوعیت و معیار	Period عرصہ	Government to which debitable گورنمنٹ سے رقم ادا ہوگی	دستخط افسر مجاز	سزا یا جزایا غیر مناسب کارکردگی کا ریکارڈ
					Service verified as from 01-07-2020 to 30-11-2020 from Accpt. Roll and other office record.		SDEO (F) Kasak	
					In the light of Honourable High Court Peshawar Judgement of dated 1st Nov 2005, and notification of Govt. of NWFP E&D Department Notification No. 50 E&D /VI/1-13/2005 dated 10-8-2005, those who were appointed before 1st July 2001 i.e. introduction of contract policy, are regularized w.e.f. date of their appointment. Hence, the employees regularized w.e.f. 20-5-2006.			
					 Director, Peshawar NWFP E&D Department Peshawar			

Attested by

ATTESTED



Anx-C

(10) (10)

OFFICE OF THE AGENCY EDUCATION OFFICER
NORTH WAZIRISTAN AGENCY MIRANSHAH

NO: _____ / PTC/ AEO/NWA

DATED: ____ / ____ / 2015.

ADMINISTRATIVE SANCTION

In pursuance of Govt: of NWFP, Finance Department notification NO.,FD(SR.1) 6-4/2005 dated Peshawar the MAY 23,2006 the following qualified teachers of Education Department are Placed in BPS mentioned against each on accounting of possessing Higher qualification.

S.No	Name with school	Design	Qualifi:	Present BPS	Awarded BPS	Date of Up-Gradation
1.	Noor Shad Begum GGPS Jehangir kot Spulga	PTC	FA	07	09	1.10.2007
2.	Bibi Sabira GGPS Rauf Khan kot Mirali	PTC	PTC	05	06	24.6.2013

Up graded from 7 to 9

Agency Education Officer
North Waziristan Miranshah

Endst: No 934-38 / PTC / AEO / NWA Dated 29/11 / 2015.

COPY TO:

1. Director of Education FATA KPK Peshawar.
2. The Agency Accounts Officer NWA Miranshah
3. AAEOs Concerned
4. Accountant Local Office.
5. Candidate Concerned.

Agency Education Officer
North Waziristan Miranshah

Attested by

★
ATTESTED

Prs No, 50212911
N.I.C. No, 14202-1284697-4

- 1- Name (نام) Noor Shad Begum Am D 11
- 2- Nationality and Religion Islam / Pakistani (1/-)
- 3- Residence Near old Civil Hospital Karak.
(مستقل رہائش)
- 4- Father's name and residence Rehmat Gul
(والد کا نام اور پتہ)
- 5- Date of birth by christian era as 15-02-1974 (Fifteen Feb
nearly as can be ascertained nineteen Seventy four)
(تاریخ پیدائش مطابق سن عیسوی)
- 6- Exact height by measurement 4'-9"
(قد و قامت)
- 7- Personal mark of identification NIL
(نشان شناخت)

Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)

(دائیں اور بائیں ہاتھ کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger

(چھنگلیا)

Ring Finger

(چھنگلیا کے ساتھ کی انگلی)

Middle Finger

(انگشت میاں)

Fore Finger

(انگشت شہادت)

Thumb

(انگوٹھا)

Noor Shad Begum

9. Signature of Govt. Servent

(سرکاری ملازم کے دستخط)

10. Signature and designation of the Head of the Office or other Attesting officer

(تصدیق کنندہ افسر کے دستخط اور مہر)

Agency Education Office,
N.W. Agency Miranahab

Note: The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہیے۔

انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں

Attested by

TTES

1	2	3	4		5		6	7	8
Name of Post	Whether Substantive or officiating and whether permanent or temporary	If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 4-20 of C.S.R. (Pb.) Volume II	Pay in substantive position		Additional pay for officiating		Other emoluments falling under the term pay	Date of appointment	Signature Government
			Rs.	Ps.	Rs.	Ps.			
درجہ ملازمت P.T.C Post گ.ف.پ.س	عارضی مستقل یا یا قائم مقام	رول کے مطابق پیش کش کا مستحق ہے؟	تنخواہ بطور	عارضی ملازمت	زائد تنخواہ	بطور قائم مقام	ماسوائے تنخواہ دیگر الاؤنس	تاریخ تقرری	دستخط رکابی ملازم
Jahan Faruk Kot		3 P.S. 107-8	2220	120	5	820			
			Rs. 2220	120	PM	Fixed.		2005	
		pay revised B.P. 500-7	2555	140	6	55			
			Rs. 2555	140	PM	Fixed.		2005	
		pay revised B.P. 500-7	2910	160	7	10			
			Rs. 2910	160	PM			2008	
		pay Revised B.P. 500-7	3530	180	8	30			
			Rs. 3530	180	PM			2008	
			Rs. 3720	PM				2008	
			Rs. 3910	PM				2008	
			Rs. 4200	PM				2010	

12

under leave

8	11	12	13	14	15	16
Signature and designation of the Head of the office or other attesting officer (column 1 to 8)	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Signature of the Head of the office or other attesting officer	Reference to any recorded punishment or censure, reward or praised of the Government servants
دستخط سرکار ملازم افسر مجاز	تاریخ انقطاع ملازمت	وجوہات انقطاع ملازمت ترقی جبارہ یا برطرفی	دستخط افسر مجاز	Allocation of period of leave at average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government (Government to which debitable)	The Signature of the Head of the office or other attesting officer	کارکردی کا
<p>Note: - Pay verified subject to the following conditions: -</p> <p>i) Each and every entry may be got attested from DDO.</p> <p>ii) Legitimation order of option of the concerned duly signed by DDO on 1/12/17 for regularization of pay.</p>				<p>Passed CT Examination from Alama Iqbal University Islamabad Session Autumn 2000 under R.No: 1-6541802 Result declared 25th Jan, 2002, marks Obtained 58% in grade - B.</p>		
<p>Office of the AGPR Peshawar pay fixed in the Revised Basic Pay scale of Rs <u>BPS-09</u> At Rs 17180/- PM w.e.f 1-7-16 With next increment on 1-12-16</p> <p>Asstt. A/c's Officer Pay Fixation Party</p>				<p>Sanctioned according to the up gradation BPS-9 vide Govt. of NWFP Peshawar Department notification No. PDCSR-176-6/2005 Dated Peshawar the 23-5-2005 and per their order under by the Govt. Code: O.P.P. North, was Sir. istan Miran Chah order No 939-38/PIC/ABO/MWA Dated 19-4-2015</p>		
<p>T.No: 365 10/12/17</p> <p>Drawn Arrear of pay & Allow; on up gradation from BPS: 07 To BPS: 9 w.e.f 2/12/17 To 30/6/2017 amounting to Rs 187670/-</p>				<p>Agency Accounts Officer N.W.A Miran Shah</p>		
<p>Agency Accounts Officer N.W.A Miran Shah</p> <p>Agency Accounts Officer North Waziristan Agency</p>				<p>Attested A. Ghani Officer North Waziristan</p>		

ATTES

1 Name of Post	2 Whether Substantive or officiating and whether permanent or temporary	3 If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II	4 Pay in substantive position		5 Additional pay for officiating		6 Other emoluments falling under the term pay	7 Date of appointment	8 Signature Government servant	9 Signature of Head of office or certifying officer attesting column 1
			Rs.	Ps.	Rs.	Ps.	ما سوائے متخواہ دیگر الاونس	تاریخ تقرری	دستخط سرکاری ملازم	دستخط افسر مجاز
<p>15th Sep 2012 Revision entry on A/c of -4- Graduation from B.S. to B.S. 12 mg 1-7-2012, vide SSD No. FS/50/ Edu/450 No 2889-94 D.P. No. 22-6-14 ADE FATA No 8233-60 dt: 8/9/2016 vide AEO NWIA No 1138-43 dt: 11/11/2016</p>										
					10500			2-12-12		
					11000			1-12-13		
					11500			1-12-14		
					15555 14905			1-7-15		
					15555			1-12-15		
					19140			1-7-16		
					19940			1-12-16		
					23880/-			1-7-17		
					24840/-			1-12-17		
<p>A.S.P.R Sub-Office Peshawar. Pay fixed in the Revised Basic Pay Scale of Rs. <u>23880/-</u> BPS 12 at Rs. <u>23880/-</u> P.M.w.e.f. <u>1/7/2017</u> with next increment of <u>4400/-</u> dt: <u>1/7/2017</u> Assistant Accounts Officer Pay Fixation Party</p>										
					25800/-			01-12-18		
<p>Revised Entries in BPS-15 (16120-1330-56000)</p> <p>One Advance Inc for Rs- 2676/- +1330</p> <p>Premium Rs- 2809/- 28-12-18</p> <p>District Education Officer North-West Frontier Tribal District 29/12/18</p>										



OFFICE OF THE DIST
OFFICER, NORTH WA
DISTR

EDUCATION
N TRIBAL



NOTIFICATION: (FEMALE PSHT)

In pursuance of the Elementary & Secondary Education Department Khyber Pakhtunkhwa Notification No.(B&A)/1-18/E&SE 2012, dated: 11.7.2012 and issued by Finance Deptt: (Regulation wing) Islamabad vide Endst: No: 1(32)R-1/2015-592-2016 dated: 28/07/2016 and Directorate of Edu: (FATA) Endst: No: 8233-60, dated: 8/08/2016. Consequent upon recommendation of Departmental Promotion Committee, the following PST B-12/ SPST B-14 (Female) in N.W. T. D are hereby Promoted to the post of PSHT (B-15) Rs.(16120—1330--56020) plus usual allowances as admissible under the rules on regular basis under the existing policy of Provincial Govt. in teaching cadre. They are placed at the disposal of DEO N.W.T.DS for further adjustment on the terms & conditions mentioned below with immediate effect.

S#	Sen #	Name of Teacher	Date of Birth	Place of Posting	Remarks
1	63	Naznin Begum	07.03.1970	GGPS Zar Khan Kot	Promoted to the post of PSHT on regular basis B15 with immediate effect.
2	87	Farzana	01.10.1970	GGPS Lal Jan Kot	Do
3	88	Baskhudam	03.06.1979	GGPS Mubarik Khan	Do
4	89	Farzana	12.04.1982	GGPS Toor Ajam Kot	Do
5	92	Balqis Akhtar	09.08.1979	GGPS Sherdad Kot	Do
6	93	Chand Gul	01.02.1975	GGPS Akbar Khan Kot Shewa	Do
8	98	Musrat Nishad	06.01.1978	GGPS Aurangzeb Kot	Do
9	104	Nasrin	19.12.1980	GGPS Noor Fazal Kot	Do
10	113	Farzana Nawab	01.02.1981	GGPS Inayat Khan Kot	Do
11	114	Fehmeeda	01.04.1974	GGPS Mir Akbar Kot Mir Ali	Do
12	115	Tehmina Rauf	05.10.1966	GGHS Civil Colony Miranshah	Do

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				Miranshah.	
13	117	Shabana Naz	12.05.1979	GGPS Aurangzeb Kot	Do
14	118	Rashida NoorIn	03.09.1979	GGPS Ahmad Jan Kot	Do
15	120	Nadia Akbar	16.05.1983	GGPS Rlahan Kot	Do
16	121	Tamana Gul	01.05.1981	GGPS Mohammad Wali Kot	Do
17	122	Rasul Niaza	20.02.1984	GGPS Hafizabad Hassu Khel	Do
18	124	Zalnab Ferdoos	10.09.1980	GGPS Yunas Kot	Do
19	128	Roovina Bibi	01.02.1976	GGPS Sardar Habibullah Kot	Do
20	131	Zinat Iqbal	06.09.1979	GGPS Jahangir Kot	Do
21	134	Rubina Shaheen	01.03.1979	GGPS Gul Maroof Kot	Do
22	135	Umer Yasim	25.01.1980	GGPS Arbab Kot	Do
23	136	Shima	14.02.1980	GGPS Asal Mar Jan Kot	Do
24	137	Zaib Un Nisa	09.01.1976	GGPS Shah Alam Kot	Do
25	138	Kalsum Bibi	14.03.1980	GGPS Said Manoor Kot	Do
26	140	Niaz Jamila	01.01.1981	GGMS Rafi Gul Kot Mirali	Do
27	141	Zalnub Bibi	13.02.1981	GGPS Pir-Rehman	Do
28	142	Asma Ayaz	13.02.1982	GGPS Hukman Kot	Do
29	148	Falak Naz	01.04.1983	GGPS Saleh Gul Kot	Do
30	150	Perween Jehan	07.07.1977	GGPS Shakim Jan Kot	Do
31	154	Perween Sultana	17.12.1977	GGPS Gul wali Kot	Do
32	155	Bibi Saira	02.04.1980	GGPS Lazim Khan	Do
33	156	Rukhsana Begum	15.08.1977	GGPS Idal khel	Do
34	157	Shahida Begum	01.09.1976	GGPS Akram Kot Tochi Par Tappi	Do
35	158	Qaisar bibi	22.04.1979	GGPS Sher Ayub Kot	Do

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36	159	Maklela Begum	03.10.1979	GGPS Inzar Kass Kazha Mada Khel Datta Khel	Do
37	160	Gul Naz Begum	15.08.1981	GGPS Muhammad Noor Kot	Do
38	164	Bibi Sufiah	03.01.1978	GGPS Najeem Khun Kot	Do
39	166	Sherina Naz	15.08.1978	GGPS Sakhi Mar Jan Kot	Do
40	167	Sariqat	30.04.1975	GGMS Arsala Jan Kot	Do
41	168	Rukhsar Begum	09.08.1979	GGPS Mohd Sadiq Mandi Khel	Do
42	169	Sameen Gul	12.09.1976	GGPS Anar Gul Kot	Do
43	170	Noor Shad Begum	15.02.1974	GGPS Jahangir Kot	Do
44	171	Saeeda Akhtar	03.02.1978	GGPS Shakim Jan Kot	Do
45	174	Zubida Ghani	01.01.1977	GGPS Bakht Ali Kot	Do
46	175	Fatima Bibi	03.01.1974	GGPS Farid ullah	Do
47	176	Neghat Seema	30.03.1977	GGMS Badshah Mir Khan Kot	Do
48	177	Nayla Yasmin	01.01.1980	GGMS Mir Akbar Kot	Do
49	178	Bushra Rashid	02.08.1980	GGPS Liaz Kot	Do
50	182	Mehnaz Begum	01.12.1982	GGPS Rangin Kot	Do
51	188	Hussan Zada	08.03.1978	GGPS Jalil Kot	Do
52	189	Balqis Bibi	15.09.1979	GGPS Gul Rushan Kot	Do
53	190	Musarat Nazir	03.01.1982	GGMS Doctor Noor Janat Gul Kot	Do
54	191	Zafran Akhtar	15.08.1979	GGPS Abdullah Shah Kot Isha Piran	Do
55	193	Basmina	01.01.1984	GGPS Nek Daraz Kot	Do
56	194	Tahlra Shaheen	20.03.1979	GGPS Asif Nawaz	Do
57	195	Anwar Sultana	20.02.1983	GGPS Zahoor Din Kot	Do

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58	196	Ume KalSum	01.01.1985	GGPS.Mohammad Noor Kot Khaddi	Do
59	197	Pari Naz	25.09.1980	GGPS Akram Kot	Do
60	198	Razla Sultana	06.09.1984	GGPS Darya	Do
61	199	Naheed Tabassum	28.06.1977	GGPS Mohammad Karim Kot	Do
62	200	Rahila Ferdous	14.11.1980	GGPS Arbab Kot	Do
63	203	Khatim Un nisa	01.01.1983	GGPS Nek Daraz Kot	Do
64	207	Bibi Zaina	02.03.1975	GGPS Fazal Karim	Do
65	208	Najma Shaheen	01.02.1981	GGPS Zamindar Kot	Do
66	209	Saira	14.03.1979	GGPS Noor Mohammad Kot Spinwam	Do
67	216	Gul Nasrin	01.01.1984	GGPS Tehsil Khan Kazha Mada Khel Datta Khel	Do
68	222	Taslim Akhtar	01.04.1979	GGPS Sher Ayub Kot	Do
69	225	Zubida	15.08.1979	GGPS Saifullah Kot	Do
70	224	Ruqla Ahmad	10.11.1979	GGPS Qutab Khan	Do
71	230	Naveeda Hayat	01.01.1980	GGPS Mawaz Kot	Do
72	232	Sartaj Begum	06.06.1981	GGPS Abidullah Shah Kot Mandi Khel Dossali	Do
73	233	Busnihada	01.01.1982	GGPS Badshah Mir Khan Kot	Do
74	235	Islam Khatoon	01.07.1982	GGPS Anwar Abad	Do
75	236	Zahida Khatoon	13.02.1983	GGPS Anwar Abad	Do
76	237	Shamim Ara	19.02.1984	GGPS Mohammad Azam	Do
77	238	Sabiha Anjam	01.04.1979	GGPS Zarghun Shah Kot	Do
78	242	Taslim Bibi	14.08.1980	GGPS Akram Kot	Do
79	243	Arjuman Shakila	20.12.1982	GGPS Gul Jan Kot	Do
80	245	Bakhat Zameena	26.02.1991	GGPS Zahir Shah Kot	Do


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81	251	Khalida	04.12.1974	GGPS Sher Mohammad Kot	Do
82	252	Hasina Noor	01.04.1976	GGPS Wakila Jan Kot	Do
83	253	Rashida Bibi	17.09.1977	GGMS Mohammad Amin Kot	Do
84	254	Shaheen	03.04.1980	GGPS Noor Khan Kot	Do
85	255	Azra Noor	25.09.1980	GGPS Rasula Khan Kot Hasso Khel	Do
86	258	Basta Noora	04.04.1982	GGPS Jamal Khan Kot	Do
87	259	Misruna	15.01.1983	GGHS Khan Mir Kot	Do
88	260	Asifa Kanwal	26.03.1984	GGHS Khan Mir Kot	Do
89	261	Nazia Amin	28.04.1984	GGPS Jamal Khan Kot	Do
90	262	Shah Fahad Noora	05.05.1984	GGMS Mallk Jan Bahadar Kot	Do
91	263	Iqbal Niaza	08.03.1985	GGPS Shamar Kot	Do
92	264	Khanau Shada	08.06.1985	GGMS Mohammad Noor Kot	Do
93	279	Qudsia Tabasam	01.10.1976	GGPS Mirzall Kot	Do
94	282	Refat Bannu	10.05.1980	GGPS Ajab Khan Kot	Do
95	283	Farah Bibi	06.05.1986	GGPS Mohammad Nawaz Kot Razmak	Do
96	284	Nasrin Rehman	02.05.1985	GGMS Laiq Zaman Kot Khatti Killa Miranshah	Do
97	285	Farhana Naz	02.04.1980	GGPS Mohammad Salam Kot	Do
98	286	Noreen Khan	02.12.1989	GGPS Sher Ali Boya	Do
99	301	Atya Jan	01.05.1988	GGPS Taj Mohammad Kot	Do
100	304	Shehnaz Salamat	15.02.1974	GGPS Ashraf Khan Shogi Spulga	Do
101	305	Asmat Shaheen	15.01.1984	GGPS Said Manoor Kot	Do

Benir Ahmad

Attested by 


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102	306	Zahida Bibi	10.12.1983	GGPS Mutabar Khan Kot	Do
103	309	Zuhra Bibi	10.02.1977	GGPS Rauf Khan Kot Mirali	Do
104	311	Shazia Andaleep	01.08.1980	GGPS Wallmat Khan Kot	Do
105	313	Aqlim akhtar	15.11.1974	GGPS Sher Mohammad Kot	Do
106	314	Shamim Ijaz	08.11.1976	GGPS Khan Shashi Khel	Do
107	317	Mehnaz	14.05.1984	GGPS Bakhtazar Kot	Do
108	318	Mir Sahib Zada	07.02.1978	GGPS Gul Maroof Kot	Do
109	321	Qamrona	08.07.1984	GGPS Mohammad Tahir Kot	Do
110	322	Saira Khatoon	23.01.1986	GGPS Qattali	Do
111	326	Shakila	08.03.1981	GGMS Sharifullah Kot	Do
112	327	Khushnama	13.06.1982	GGPS Amir Rehman Kot	Do
113	328	Amina Begum	01.01.1986	GGPS Afsar Gul Kot	Do
114	329	Yasmin Begum	01.04.1976	GGPS Mushtaq Ahmad Kot	Do
115	336	Salma Bibi	01.04.1985	GGPS Najeem Khun Kot	Do
116	337	Asma Bibi	01.04.1985	GGPS Badshah Mir Khan Kot	Do
117	339	Suraya Jabeen	03.04.1986	GGPS Saifullah Kot	Do
118	340	Rubina Gul	02.01.1980	GGMS Mir Ghulam Kot	Do
119	341	Salma Gul	05.04.1984	GGPS Abdul Hameed Kot Hurmaz	Do
120	343	Salma Nek	15.10.1985	GGPS Lal Salam Kot	Do
121	344	Shah Naz Bibi	01.12.1987	GGPS Naeem Kot	Do
122	345	Naeem Akhtar	01.01.1989	GGPS Naeem Kot	Do
123	346	Shazia Zaman	12.04.1982	GGPS Dost Muhammad Kot	Do

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124	347	Salma Hameed	04.04.1990	GGPS Mohammad Wali Kot	Do
125	350	Umer Zada Bibi	21.02.1990	GGPS Muzamil Kot	Do
126	352	Rushan Dara	05.07.1989	GGPS Mohammad Noor Kot Khaddi	Do
127	354	Sufia Jabeen	06.06.1981	GGPS Noor Khan Kot	Do
128	357	Naeema Noor	27.09.1989	GGPS Fazal Illahi Kot	Do
129	358	Rahila	29.09.1989	GGPS Ayub Kot	Do
130	359	Hasina wazir	01.01.1991	GGPS Amir ullah spulga	Do
131	365	Salma	08.02.1979	GGPS Bakhta Din Kot	Do
132	387	Agnus Munawar	10.05.1982	GGPS Akhya Jan Kot Pai Khel Datta Khel	Do
133	388	Irfana Bibi	26.03.1982	GGPS Zar Khan Kot	Do
134	389	Nooreen	13.10.1985	GGPS Sahib Rahman Kot	Do
135	390	Mehnaz Alam	16.10.1986	GGPS Sher Zali Khan Kot Tappi Miranshah	Do
136	391	Bas Khubana	24.01.1990	GGPS Asal Mar Jan Kot	Do
137	392	Damam Zada	24.01.1990	GGPS Mir Akbar Kot	Do
138	393	Gul Shada	08.04.1983	GGPS Noor Syed Rahman Kot Mussaki Mirali	Do
139	394	Zubia Bibi	04.04.1990	GGPS Shaheed Ullah Kot Dossali	Do
140	395	Halla	01.06.1990	GGPS Niaz Mohd	Do
141	396	Rubina	03.01.1991	GGPS Bakhtawar Kot Assad Khel Dossali	Do
142	397	Shahira	06.03.1984	GGPS Mohd Sadiq Kot	Do
143	404	Sherina	01.01.1987	GGPS Gul Zamin Kot	Do
144	405	Asma Khan	17.01.1988	GGPS Gul Manoor Kot	Do
145	407	Rafia Bibi	07.03.1989	GGPS Fazal Khan Kot	Do

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146	408	Kalim Dana	15.03.1989	GGPS Bakhtawar Kot Assad Khel Dossali	Do
147	412	Najla	07.08.1991	GGPS Niaz Mohd	Do
148	414	Aisha bibi	10.08.1988	GGHS Pir Aqal Zaman Kot	Do
149	415	Basnnora	12.09.1988	GGPS Gulmatl Kot Nawana	Do
150	416	Bibl Zaina	12.10.1989	GGPS Zar Wali Khan Kot	Do
151	417	Bibl Hamida	10.03.1990	GGPS Madak Kot	Do
152	419	Samrin	01.04.1989	GGPS Gul Muhammad Kot	Do
153	422	Rooh Niaza	03.04.1978	GGPS Zafar Ali Kot	Do
154	425	Memoona Noor	02.02.1990	GGPS Zahoor Din Kot	Do
155	426	Shabina	14.10.1985	GGPS Noor Saleh Din	Do
156	427	Zahida-un Nisa	01.01.1987	GGPS Afsar Khan Kot	Do
157	428	Asma Noor	03.06.1988	GGPS saifullah Kot	Do
158	431	Tehsina	11.08.1984	GGPS Rabab Kot Kirkanwan	Do
159	435	Safia	16.10.1988	GGPS Lal Jan Kot	Do
160	436	Sobia Mumtaz	01.01.1900	GGPS Gul Rauf kot	Do
161	437	Muzdalefa	26.10.1988	GGHS Pir Aqal Zaman Kot	Do
162	438	Sadla	12.02.1990	GGPS Marwat Khan	Do
163	439	Lubna	24.03.1990	GGPS Adam Khan Kot	Do
164	443	Salma	22.09.1990	GGPS Mir Wali Khan	Do
165	445	Zainaba	11.03.1991	GGPS Gulmat Kot Khushali	Do
166	446	Gul Shada	04.02.1992	GGPS Gul Sanar Kot	Do
167	447	Khalida Bibi	08.09.1992	GGPS Abidullah Shah Kot Mandi Khel Dossali	Do
168	448	Niab Tariq	01.04.1988	GGPS Zafar Ali Kot	Do

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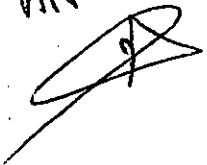
Attested by

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169	449	Ome Omera	12.01.1994	GGPS Wakil Khan	Do
170	450	Salam Bibi	15.02.1984	GGPS Azimullah Kot	Do
171	451	Najma Naz	31.12.1981	GGPS Gul Mohammad Khel Kot	Do
172	453	Mehnaz	13.05.1987	GGPS Alam Gul Kot	Do
173	454	Saira Batti	12.05.1988	GGMS Laiq Zaman Kot Khatti Killa Miranshah	Do
174	455	Asma Bibi	08.08.1989	GGPS Saifullah Kot	Do
175	458	Sadaf Noorin	24.06.1990	GGPS Saeed Nawaz Kot	Do
176	459	Tanveer Akhtar	05.04.1973		Do
177	461	Roshan Parl	03.12.1981	GGPS Shahidullah Kot	Do
178	462	Ulfat Yasmin	01.01.1986	GGPS Kefayatullah Kot	Do
179	464	Shabina	15.05.1992	GGPS Mohd Karim Kot	Do
180	466	Sanam Javed	27.07.1987	GGPS Afsar Khan Kot	Do
181	466	Haleema	07.03.1987	GGPS Zahir Shah Shoi Khel	Do
182	467	Noorin	01.01.1973	GGPS Shah Nawaz Kot	Do
183	468	Zeenat Amber	12.04.1980	GGMS Mir Ghulam Kot	Do
184	469	Menhaja Bibi	10.11.1986	GGPS Hafizabad Hassu Khel	Do
185	470	Mahjabina Kaunwai	10.02.1988	GGPS Mohammad Karim Kot	Do
186	471	Shahzada	22.03.1990	GGPS Hassam ud Din	Do
187	472	Nusrat Begum	01.01.1970	GGPS Khan Zullah Palasin kot	Do
188	473	Zinat Begum	15.03.1988	GGPS Barakat Khan	Do
189	474	Asma Bibi	07.08.1989	GGPS Abdullah Shah Kot Isha Piran	Do
190	476	Sadia Naubat	02.04.1978	GGPS Bara Khan Razmak	Do

By
Amir

Attested by


ATTESIED

22

191	477	Safia Naubat	03.03.1979	GGPS Bara Khan Razmak	Do
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Terms and Conditions.

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations issued from time to time by the Government.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probation period. In case of misconduct they will be proceeded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their inter 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 Books to the effect that if any over payment has made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.

(Zait Ullah Khan)
District Education Officer
Miran Shah N.W. T.D

Ends: No: 13107-13 DEO/N.W.T.D
27/12/2018.

dated

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Director Education (FATA) KP Peshawar
4. T.D Accounts Officer N.W.A Miran Shah.
- 5... Official concerned.

Laal
Basim
Basim

Zait Ullah Khan
District Education Officer
Miran Shah N.W. T.D.

Attested by
[Signature]

ATTESTED

ANX F (23)

9	10	11	12	13	14	15		
Signature and designation of the Head of the office or other attesting officer (column 1 to 8)	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debitible to another Government		Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants
					Period	Government to which debitible		
دستخط افسر مجاز	تاریخ انقطاع ملازمت	وجہات انقطاع ملازمت ترقی تبادل یا رطرنی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	پارہات تک کی رخصت کے لئے اوسط خواہ کا تین	گورنمنٹ جسے رقم ادا ہوگی	دستخط افسر مجاز	سزا یا جزایا غیر مناسب کارکردگی کا ریکارڈ

T. 23
 drawn amount of pay allowed:
 w.e.f 1⁶/₁₃ to 18⁹/₁₇ for B.P.S-12/-130826/-
 due to upgradation from
 B-9 to B-12

Service verified w.e.f
 01-12-04 To 30-11-018
 from office record.

T. 23
 2/1/19

DISTRICT EDUCATION OFFICER
 TRIBAL DISTRICT NORTH WAZIRISTAN

drawn Rs=3541/- Arrears pay & allowances
 due to upgradation to B.P.S-12 to
 B.P.S-15 through system

Sanctioned accorded to the
 Promoted to B.P.S-15
 vide D.E.O/N.W.T.D Enrolt
 No. 13107-13 Dated 27-12-2008

AAC
 11/2/19

DISTRICT EDUCATION OFFICER
 TRIBAL DISTRICT NORTH WAZIRISTAN

D.E.O
 TD(NW)

30-11-018 A/9nc

Service verified w.e.f
 01-12-2018 To 30-11-2019
 from office record.

27-12-018 Promoted to
 B.P.S-15

D.E.O
 TD(NW)

30-11-2019 A/9nc

DISTRICT EDUCATION OFFICER
 TRIBAL DISTRICT NORTH WAZIRISTAN

Attested by

ATTES...

Anx-F (24) (24)

Miran Shah-N.W.

S#:3180

P Sec:001 Month:May 2020
MW6014 -DEO Primary Education Nort
DEO PRIMARY EDUCATION NOR

Pers #: ~~5026511~~ Buckle:
Name: NOOR SHAD BEGUM
PRIMARY SCHOOL TEACHER
CNIC No.1420212846974
GPF Interest Applied
15 Active Temporary

NTN:
GPF #:
Old #:

MW6014 -125

PAYS AND ALLOWANCES:

0001-Basic Pay
1000-House Rent Allowance
1210-Convey Allowance 2005
1300-Medical Allowance
1528-Unattractive Area Allow
2148-15% Adhoc Relief All-2013
2199-Adhoc Relief Allow @10%
2211-Adhoc Relief All 2016 10%
2224-Adhoc Relief All 2017 10%
Gross Pay and Allowances

29,420.00
2,349.00
2,856.00
1,500.00
1,000.00
550.00
389.00
1,998.00
2,052.00
46,884.00

DEDUCTIONS:

GPF Balance 103,846.00
3501-Benevolent Fund
3990-Emp.Edu. Fund KPK
4004-R. Benefits & Death Comp:

Subrc: 2,890.00
600.00
125.00
600.00

Total Deductions

4,215.00

44,669.00

D.O.B
15.02.1974
16 Years 00 Months 013 Days

LFP Quota: 4
HABIB BANK LIMITED KARAK
7900846103

ATTESTED

Attested by

Ant G (25)

PS/11/11/11
B-11/11/11
G



Office of the

AGENCY EDUCATION OFFICER, N.W. AGENCY

at Miranshah

1-7-2012

NOTIFICATION:

In pursuance of the Elementary & Secondary Education Department Khyber Pakhtunkhwa Notification No.(B&A)/1-18/E&SE 2012, dated: 11.7.2012 and issued by Finance Deptt: (Regulation wing) Islamabad vide Endst: No: 1(32)R-1/2015-592-2016 dated: 28/07/2016 and Directorate of Edu: (FATA) Endst: No: 8233-60, dated: 8/08/2016. Consequent upon recommendation of Departmental Promotion Committee, the following Sr.PST B-14 (Female) in N.W. Agency are hereby Promoted to the post of PSTT (B-15) Rs.(B&A-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy of Provincial Govt. in teaching cadre. They are placed at the disposal of AEO N.W. Agency for further adjustment on the terms & conditions mentioned below with effect from 01/07/2012

Sr	Name of Teachers	Place of Posting	Remarks
1	Raza Bibi	GGPS Gul Syed Kot	Promoted to the post of PSTT BPS 15 on regular basis with effect 1/07/2012.
2	Fatima	GGPS Gul Syed Kot	-do-
3	Safia Gul	GGPS Civil Colony Miranshah	-do-
4	Plumona Akhtar	GGPS Bahri Gul Kot	-do-
5	Muhammad Begum	GGPS Ashraf Jan Kot Far Khel Datta Khel	-do-
6	Farida Khanum	GGPS Ashraf Jan Kot	-do-
7	Shamina Begum	GGPS Mohammad Jamil Kot	-do-
8	Khawaja Musrat	GGPS Missal Khan Kot	-do-
9	Moor Jehan	GGPS Hamayoon Kot	-do-
10	Shakila	GGPS Zar Wali Khan Kot	-do-
11	Shahida Begum	GGPS Malik Hassan Kot	-do-
12	Sham Shad Begum	GGPS Gagan Kot	-do-
13	Shagufta Bibi	GGPS Akhtar Zaman Kot	-do-
14	Shahid-u-Nisa	GGPS Ashraf Jan Kot	-do-
15	Gul Shada	GGPS Rabah Kot Kirmanwan	-do-
16	Wajahat Naz	GGMS Rehamatullah Kot	-do-
17	Nasrin Akhtar	GGPS Marwat Khan Kot	-do-
18	Maveed Anjam	GGPS Motari mazar Khel	-do-
19	Farzana	GGPS Moor Mohammad Kot	-do-
20	Rudhsana	GGPS Anar Kot	-do-

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S#	Name of Teachers	Place of Posting	Remarks
21	Rubina Begum	GGPS Mohd Sadiq Kot	Promoted to the post of PSI T
22	Kausar Begum	GGPS Shehzad Gul Kot	BPS-15 on regular basis with effect 1/07/2012.
23	Bibi Stira	GGPS Akhtar Nawaz Kot	-do-
24	Sajida	GGPS Atlas Kot	-do-
25	Nasreen Khan	GGPS Alla Nawaz	-do-
26	Nargus Bibi	GGPS Inayat Khan Kot	-do-
27	Imrana Bibi	GGPS M Jamil Kot	-do-
28	Fehmida Yasmin	GGPS Sherbaz Kot	-do-
29	Kalsum Bibi	GGPS Asif Kot Madi Khel	-do-
30	Dil Feroz Bibi	GGPS Mohammad Latif Kot	-do-
31	Shafia Zaman	GGPS Barakat Khan	-do-
32	Dil Pari Jana	GGPS Asif Kot Madi Khel	-do-
33	Basmina Jehan	GGPS Adam Khan Kot	-do-
34	Wajeeda Almas	GGPS Sahib Rahman Kot	-do-
35	Akhtar Sultan	GGPS Mohammad Nawaz Kot	-do-
36	Ihsan Bibi	GGPS Gul Zary Tall	-do-
37	Muneera Akhtar	GGMS Zardad Kot	-do-
38	Musarat Iqbal	GGPS Mohammad Din Kot	-do-
39	Qamar Laila	GGPS Gul Mar Jan	-do-
40	Shaheen Begum	GGMS Riaz Ahmad Kot	-do-
41	Gul Ferween	GGPS Mohammad Sahir Kot	-do-
42	Kausar Zia	GGPS Waliullah Kot	-do-
43	Nasrin	GGPS Adat Khan Kot	-do-
44	Dil Shad Begum	GGPS Hafiz-ud-Din	-do-
45	Fayaz Anjam	GGPS Mohammad Noor Din Darpa Khel	-do-
46	Fauzia Naz	GGPS Lal Jan Kot	-do-
47	Seemab	GGMS Mohammad Noor Kot	-do-
48	Bibi Sakina	GGPS Jan Ahmad Kot	-do-
49	Shakila Masch	GGPS Sher Mohammad Kot	-do-
50	Asma Jan	GGPS Bilawar Kot	-do-
51	Shaista Khalil	GGPS Habibur Rehaman Kot	-do-
52	Rizwana Gul	GGPS Nek Daraz Kot	-do-
53	Balqies Begum	GGPS Jan Ahmad Kot	-do-
54	Salma	GGPS Ajab Khan Kot	-do-
55	Tamjeeda	GGPS Abbas Khan Kot	-do-
56	Shahida Bibi	GGPS Akbar Jan Kot	-do-
57	Rubina Akhtar	GGHS Razmak Camp	-do-
58	Shabeena Fakhar	GGPS Inayat Khan Kot	-do-
59	Magluma Ibrahim	GGPS Nasir ud Din Kot	-do-
60	Sajida	GGMS Atta Mohammad Kot	-do-
61	Tahira Yasmin	GGPS Sherbaz Kot	-do-

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(27)

S#	Name of Teachers	Place of Posting	Remarks
62	Asmat Shaheen	GGPS Bakhtalai Kot	Promoted to the post of PSHT BPS-15 on regular basis with effect 1/07/2012.
63	Razia Begum	GGPS Shad Amin Kot	-do-
64	Zarin Taj	GGPS Jalil Kot	-do-
65	Nazia Begum	GGPS Khanzallah Kot	-do-
66	Rubana Hanif	GGPS Rasool Janan Manzar Khel	-do-
67	Kausar Shaheen	GGPS Khonia Khel	-do-

Terms and Conditions

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations issued from time to time by the Government.
3. Their services can be terminated at any time, In case their performance is found unsatisfactory during probation period. In case of misconduct they will be preceded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their inter seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment has made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.

(AWAL AYAZ KHAN)
Agency Education Officer
N.W. Agency.

Endst: No: 1376-80/P.T.C (E)

Dated N.W.A the: 05/12/2016.

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Director Education (FA/TA) KP Peshawar
4. Agency Accounts Officer N.W.A Miran Shah.
5. Official concerned.

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Agency Education Officer
N.W. Agency.

ATTESTED



Office of the

AGENCY EDUCATION OFFICER, N.W. AGENCY

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NOTIFICATION:

In pursuance of the Elementary & Secondary Education Department Khyber Pakhtunkhwa Notification No.(B&A)/1-18/E&SE 2012 dated 11.7.2012 and issued by Finance Deptt: (Regulation wing) Islamabad vide Endst: No: 1(32)R-1/2015-592-2016 dated 28/07/2016 and Directorate of Edu: (FATA) Endst: No: 8233-60 dated 8/08/2016. Consequent upon the recommendation of Departmental Promotion Committee, the following Female PST B-12 in N.W. Agency are hereby Promoted to the post of Sr. PST (B-14) Rs.(8000-610-26300) plus usual allowances as admissible under the rules on regular basis under the existing policy of Provincial Govt. in teaching cadre. They are placed at the disposal of AEO N.W. Agency for further adjustment on the terms & conditions mentioned below with effect from 01/07/2012.

S#	Name of Teachers	Place of Posting	Remarks
1	Baskhodara	GGPS Mubarak Khan	Promoted to the post of Sr. PST BPS-14 on regular basis with effect 1/07/2012.
2	Farzana	GGPS Toor Ajam Kot	-do-
3	Memooda Salim	GGPS Sultan Mehmood	-do-
4	Asia khatoon	GGPS iqman Kot	-do-
5	Balqis Akhtar	GGPS Sherdad Kot	-do-
6	Chand Gul	GGPS Akbar Khan Kot Shewa	-do-
7	Bibi Razia	GGPS Balasht Kot	-do-
8	Malika Bibi	GGPS Mubad Nawaz Kot	-do-
9	Gulshan Ara	GGPS: Tuzkhi Kot	-do-
10	Musrat Nished	GGPS Aurangzeb Kot	-do-
11	Samina Raz	GGPS Mohammad Latif Kot	-do-
12	Farzana	GGPS Mir Khatim Kot	-do-
13	Khalida Yasmin	GGPS Samandar Kot	-do-
14	Mariam Jamila	GGPS Zardad Khan Kot	-do-
15	Fahmida Begum	GGPS Mohammad Noor Kot Kashmir Khei	-do-
16	Farzana Nawab	GGPS Inayat Khan Kot	-do-
17	Safana Bibi	GGPS Sher Nawaz Kot	-do-
18	Tehmina Rauf	GGHS Civil Colony Miranshah	-do-
19	Parveen Begum	GGPS Sher Nawaz Kot	-do-
20	Shabana Naz	GGPS Aurangzeb Kot	-do-
21	Rashida Noorin	GGPS Ahmad Jan Kot	-do-
22	Mehnaz Part	GGPS Fazal Karim Kot	-do-
23	Nadia Akber	GGPS Rishan Kot	-do-
24	Rasul Naza	GGPS Hafizabad Hassu Khei	-do-
25	Sofia Shaheen	GGPS Said Manoor Kot	-do-

ATTESTED

Page 1 of 1 BPS-14 (F)

ATTESTED

Agency Education Officer
N.W. Agency.

[Signature]

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. Director Education (FATA) KP Peshawar
4. Agency Accounts Officer N.W.A Minon Shah.
5. Official concerned.

Copy forwarded to the:-

EndstNo: 1381-85/R/C/16, Dated N.W.A the: 05/12/2016.

(AWAL AYAZ KHAN)
Agency Education Officer
N.W. Agency.

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations issued from time to time by the Government.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probation period. In case of misconduct they will be proceeded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their inter seniority on lower post will remain intact.
6. No TADA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service Books to the effect that if any over payment has made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.

Terms and Conditions

Sl No	Name of Teachers	Place of Posting	Remarks
26	Nasreen Begum	GPS Saida Khwa Kot	Promoted to the post of Sr. PST BP-14 on regular basis with effect 1/07/2012
27	Rozina Bibi	GPS Sarder Habibullah Kot	-do-
28	Shahida Naz	GPS Sayed Hassan Kot	-do-

Page 2 of 2 (11/11/14/16)

29

Ank I (301)

**IN THE OFFICE OF DIRECTOR EDUCATION ELEMENTARY AND SECONDARY
EDUCATION KHYBER PAKHTUNKHAWA, PESHAWAR**

To : Muhammad Ibrahim,
Director Education, Elementary & Secondary Education
Khyber Pakhtunkhwah, Peshawar

Dated: 06/ 05/2021

**Subject: Departmental Appeal Regarding for correction in the Notification No.
13107-13/DEO/N.W.T.D dated 27-12-2018 issued by District Education
Officer(N.W.T.D) Miranshah**

Honorable Sir,

Being aggrieved from the notification/order NO.13107 -13/DEO/N.W.T.D dated 27-12-2018 Issued by DEO Miransha, the following few lines are submitted for the redressing of grievances and sympathetic action please,

- That the applicant was serving as Primary School Teacher since 19-05-2004 at GGPS Jahangir Kot in district N.W.T.D Miransha and has been recently promoted as Primary School Head Teacher (PSHT) BPS-15 from BPS 12. (Promotion order copy attached as Annexure A). The applicant is mentioned on Sr # 43.
- That in the light of the presidential order No. 13 of 1972 and to pursuance of Elementary and Secondary Department, Khyber Pakhtunkhwa notification No. SO(B&A)/1-18/E&SE/2012 DATED Peshawar,11-07-2012,the Section Officer (Education) Social Sector Department FATA Secretariat had accorded sanction for the up-gradation of the post of different categories of teacher working in FATA.
- That there are 361 Girls Primary Schools under Agency Education Officer Miranshah, therefore, as per above mentioned notification issued by FATA Secretariat total 361 PST were required to be promoted/ upgraded to PSHT BPS-15 in district N.W Agency.
- That in pursuance of Elementary and Secondary Department Khyber Pakhtunkhwah notification No. SO(B&A)/1-18/E&SE/2012 dated11-07-2012, the Agency Education Officer North Waziristan Agency, Miranhaha vide partial order promoted 67 PST (Female) BPS-14 to the post of PSHT (BPS-15) with effect from 01-07-2012 (copy of Notification No. 1376-80/P.T.C (F) dated 05-12-2016. Copy attached as Annexure B.
- That in pursuance of the said Notification SO (B&A)/1-18/E&SE/2012 dated11-07-2012, of Elementary and Secondary Department Khyber Pakhtunkhwah, the district Education Officer. North Waziristan promoted a number of 191 PST (Female), BPS-12 to PSHT including the applicant with immediate effect from the date of taking over charge, vide Notification No.13107 -13/DEO,N.W.T.D daed 27-12-2018.

ATTESTED

That both the notifications (No 1376-80/P.T.C (F) dated 05-12-2016 and No.13107 -13/DEO/N.W.T.D dated 27-12-2018) have been issued under the same Notification i.e. No. SO (B&A)/1-18/E&SE/2012 DATED Peshwar,11-07-2012 with effect from 1-07-2012 and 28-12-2018 respective y.This act of the concerned District Education is based on discrimination and unlawful.

- That the same discrimination has been challenged by other colleagues of the applicant in Peshawar High Court Bannu Bench, Bannu, whereby the honorable court has directed your kind office on dated 01.10-2019 to decide the grievances of the petitioner in accordance with law within period of two months. (Order sheet is attached)
- As per set precedent the applicant must be promoted to BPS 14 from BPS 12 and then from BPS 14 to BPS 15 like the other promotes. But here she has been directly promoted to BPS 15 from BPS 12. This clearly shows that her right on post BPS 14 has been violated.
- That the claim of the applicant/appellant is identical and similar to that petitioner of the writ petition cited ibid and more so one Zeenit Iqbal PSHT has also been granted promotion to BPS-15 w.e.f 01/07/2012, therefore appellant is also entitled for regularization against the post of PSHT (BPS-15) w.e.f 01-07-2012

Prayer

In the view of the above explained position, it is humbly requested before your kind honor to take exercise and issue an order for regularization of appellant against the post of PSHT (BPS-15) w,e,f 01/07/2012

Thanks & Regards


Noor Shad Begum

Ex-PHST, GGPS Jahangeer Kot Spulga
North Wazirisatn Triable District


ATTESTED

33

UMS# 610598 086960
PAKISTAN POST OFFICE
C.M.S. RECEIPT

33

No. 761 Rs. 86

Name of addressee DEE 85E

KPK Post town of destination

Date stamp Signature of booking official

Service instruction byer 12/1

ATTESTED

AMX

UMS# 610598 086960
PAKISTAN POST OFFICE
C.M.S. RECEIPT

No. 761 Rs. 86

Name of addressee DEE 85E

KPK Post town of destination

Date stamp Signature of booking official

Service instruction byer 12/1

34

**IN THE OFFICE OF DIRECTOR EDUCATION ELEMENTARY AND SECONDARY EDUCATION
KHYBER PAKHTUNKHAWA, PESHAWAR**

To : Muhammad Ibrahim,
Director Education, Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Dated: 10/07/2021

**Subject: Departmental Appeal Regarding for correction in the Notification No.
13107-13/DEO/N.W.T.D dated 27-12-2018 issued by District Education Office
(N.W.T.D) Miranshah**

REMINDER

Honorable Sir,

The appellant has filed a departmental appeal mentioned in the subject above on dated 6/05/2021. But so far no response has been received. Copy of the said appeal is attached with this reminder. Therefore, it is kindly requested to direct the concerned to share the current status of the subject appeal on the home address of the applicant.

"Noor Shad Begum w/o Ahmad Nawaz opposite Govt Higher Secondary School Karak,
Post office Karak, Tehsil and District Karak Cell No.0333-9715047".

Thanks & Regards

Noor Shad Begum

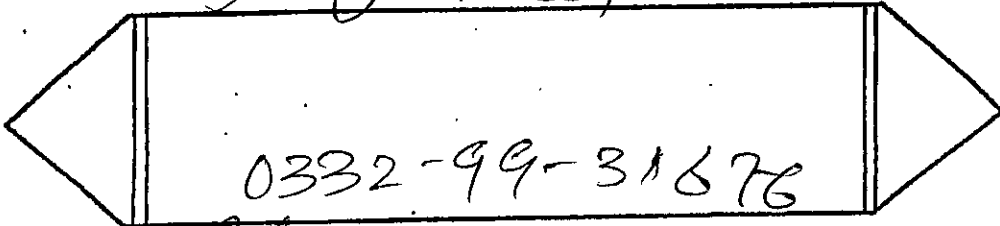
Ex-PHST, GGPS Jahangeer Kot Spulga
North Waziristan Tribal District

ATTESTED

Copy for Information:-

1. Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar

بعدالت سرورن ٹریبونل کی



0332-99-31676

فوری طور پر بنام جیلوسٹ

موزعہ
 مقدمہ
 دعویٰ
 جرم

باعث تحریر آئنگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام ایسٹ ایف سی کیلئے السلف علی اور السلف علی

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثبالت فیصلہ یہ حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک درو پیہار عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوا نے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Attested and Accepted by
/s/ [Signature]

الرقوم 3
ماہ 2021

العاب واہ العب

بمقام ایسٹ ایف سی کے لئے منظور ہے۔

فوری طور پر

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, S.B
PESHAWAR.

No.

Appeal No. 7557 of 20 21

Mst. Noor Shad Begum Appellant/Petitioner

Replied

Versus
The Govt. of KPK (Chief Secy) Respondent

Respondent No. 5

Notice to: The Distt. Education Officer (F)
Distt. North Waziristan Mervan Shah.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 22/2/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Pro-Admission Notice for Reply

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 22th

Day of Dec 20 21

(For Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
 JUDICIAL COMPLEX (OLD), KHYBER ROAD, S.B
 PESHAWAR.

No.

Appeal No. 7557 of 20 21

Mst. Noor Shad Begum Appellant/Petitioner

Read
 The Court of KPK Chief Secy. Respondent

Respondent No. 6

Notice to: — The Distt. Education Officer (F)
Distt. Karak

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 22/2/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Pre-admission Notice for Reply
 Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 22nd

Day of Dec 20 21

(for Reply)


 Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

BERNARD

ΚΥΡΑΡΕΙ ΕΛΕΥΘΕΡΟΝ ΕΠΙΧΕΙΡΗΣΙΟΝ

BERNARD

(For K 2/2)

[Signature]

On this day of the month of Dec 30 1912

before me and the seal of this Court at Bernardsville

office do hereby certify that the following

copy of articles is attached

to the articles petition

filed in case No. 1227

and that the same are filed for the purpose of ...

and that the same are filed for the purpose of ...

... and that the same are filed for the purpose of ...

... and that the same are filed for the purpose of ...

DEED KOLAR

DATE:

M. DIMITRIE KOLAR

BERNARDSVILLE

[Signature]

... and that the same are filed for the purpose of ...

BERNARDSVILLE

1227

NO.

...

28

...

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, P.B
PESHAWAR.

No.

Appeal No. 7557 of 20 21

Mst. Noor Shad Begum Appellant/Petitioner

Versus

The Govt. of KPK Chief Secy. Respondent

Respondent No. 1

Notice to: The Govt. of KPK through Chief Secretary Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner, in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 22/2/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement along with any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Pre-admission Notice for Reply

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 22 th

Day of Dec 20 21

(for Reply)

ISSUED IN CHANCELLERY
GOVT. OF KHYBER PAKHTUNKHWA
23 12/21

Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD S.B
PESHAWAR.

No. _____

Appeal No. 7557 of 20 21
Mst: Noor Shad Begum Appellant/Petitioner

Versus
The Govt. of KPK Chief Secy. Respondent

Respondent No. 2

Notice to: _____

The Secretary Education (E & SE)
KPK Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 22/12/21 at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Pre-Admission Notice for Reply

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this..... 22th

Day of..... Dec 20 21

(for Reply)

23/12/21

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, S.B
PESHAWAR.

No.

Appeal No. 7557 of 20 21

Mst. Noor Shad Begum Appellant/Petitioner

Versus
The Govt. of KPN (Chief Secy) Respondent

Respondent No. 3

Notice to: The Director Education (E & SE)
Govt. of KPN Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 22/2/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Pre-Addition Notice for Reply
Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 20 15

Day of..... Dec 20 21

(for Reply)

29-12-21

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. FB

No.

Appeal No. 7557 of 20 21

Mst. Noor Shad Begum Appellant/Petitioner

Versus

The Court of App. Chief Secy. Respondent

Respondent No. 4

Notice to: —

The Deputy Director (Estt.) Merged Areas Education Directorate Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 22/2/22 at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Pre-Admission Notice for Reply

*Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 22 12

Day of Dec 20 21

(for Reply)

[Signature]
29-12-21

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.