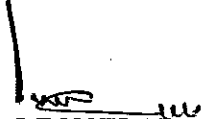



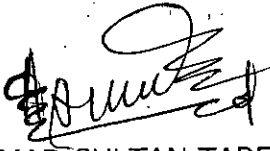
Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 6603 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/06/2021	<p>The appeal of Mst. Lila Rani presented today by Mr. Mir Zaman Safi 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 for preliminary hearing to be put up there on <u>13/08/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	13.08.2021	<p style="text-align: center;">BEFORE THE K.P SERVICE TRIBUNAL, <u>PESHAWAR.</u></p> <p style="text-align: center;">Service Appeal No. 6603/2021</p> <p>Mst. Lila Rani PST (BPS-12) GGPS Kund, Kher Abad, District Nowshera. ... (Appellant)</p> <p style="text-align: center;"><u>Versus</u></p> <p>1. The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar and 6 others. ... (Respondents)</p> <p style="text-align: center;">Mr. Mir Zaman Safi, Advocate for appellant present.</p> <p>Preliminary arguments heard and record perused.</p> <p>2. Besides, the appeal being time barred, the subject matter of the appeal is a transfer order disclosing consent of the appellant for her adjustment to a lower post in consequence of the transfer. Therefore, no arguable point is made out for full hearing of this appeal, and the same is dismissed in limine. File be consigned to the record room.</p> <div style="text-align: right; margin-right: 50px;">  (AHMAD SULTAN TAREEN) Chairman </div> <p style="text-align: center;"><u>ANNOUNCED</u> 13.08.2021</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____/2021

LILA RANI

VS

EDUCATION DEPTT:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	1- 4.
2	Affidavit	5.
3	Appointment order	A	6- 10.
4	Service Certificate	B	11.
5	Service book	C	12- 17.
6	Promotion order dated 25.02.2013	D	18- 20.
7	Impugned order	E	21.
8	Transfer order	F	22.
9	Departmental appeal	G	23- 25.
10	Forwarding letter	H	26
11	Wakalat nama	27.

APPELLANT

THROUGH:

MIR ZAMAN SAFI
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

APPEAL NO. 6603 /2021

Khyber Pakhtunkhwa
Service Tribunal.

Diary No. 10653

Dated 24-6-2021

Mst: Lila Rani, PST (BPS-12),

GGPS Kund, Kher Abad, District Nowshera.....APPELLANT

VERSUS

- 1- The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary Finance Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The District Education Officer (Female), District Bannu.
- 5- The District Education Officer (Female), District Nowshera.
- 6- The District Account Officer, District Bannu.
- 7- The District Account Officer, District Nowshera.

.....RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 02.12.2014 WHEREBY THE APPELLANT HAS ILLEGALLY BEEN DEGRADED/DOWNGRADED FROM THE POST OF PRIMARY SCHOOL HEAD TEACHER (BPS-15) TO THE POST OF PRIMARY SCHOOL TEACHER (BPS-12) WITHOUT ANY LAWFUL JUSTIFICATION AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

Filed to-day
Registrar
24/6/2021
That on acceptance of this appeal the impugned order dated 02.12.2014 may very kindly be set aside and be directed the respondents to restore the appellant in her original basic pay scale i.e. PSHT (BPS-15) w.e.f. 02.12.2014 with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:-

- 1- That appellant was initially appointed as PST (BPS-07 now BPS-12) in the respondent Department vide Notification dated 02.04.1996. That right from appointment the appellant has served the respondent Department quite efficiently and upto the entire satisfaction of her superiors. Copy of the appointment order is attached as annexure.....A.

- 2- That in the year 2005 the appellant submitted service certificate of her husband before the authorities and requested for her inter province transfer from Khyber Pakhtunkhwa to Punjab in light of the spouse policy. That concerned authority accepted request of the appellant and transferred/posted the appellant at District Attock (Punjab) on deputation for the period of three years. Copies of the service certificate and service book are attached as annexure.....**B & C.**
- 3- That in response to the directions of the competent authority the appellant started performing her duty at attock and after completion of the deputation period the appellant re-joins her parent Department at Khyber Pakhtunkhwa and started performing her duty at the concerned station with all zeal and zest.
- 4- That during service the appellant was promoted to the post SPST (BPS-14) and subsequently promoted to the post of PSHT (BPS-15) vide office order dated 25.02.2013. That after promotion the appellant took over the charge against the post of PSHT (BPS-15) and started performing her duty at GGPS Fazal Haq Malwana No.2, District Bannu efficiently and upto the entire satisfaction of her superiors. Copy of the promotion order is attached as annexure.....**D.**
- 5- That during performing duty as PSHT (BPS-15) at GGPS Fazal Haq Malwana No.2, District Bannu, the appellant requested the concerned DEO (F) for her inter district transfer due to the reason that her spouse is residing and serving at Attock but the concerned DEO (F) degraded/downgraded the appellant from the post PSHT (BPS-15) to the post of PST (BPS-12) vide impugned order dated 02.12.2014 without any lawful justification. Copy of the impugned order is attached as annexure.....**E.**
- 6- That after degradation from the post of PSHT (BPS-15) to the post of PST (BPS-12) the appellant was transferred from GGPS Fazal Haq Malwana No.2, Bannu to GGPS Kund, Kher Abad, District Nowshera vide order dated 15.12.2015. That in response to the order dated 15.12.2015 the appellant started performing her duty at her new place of duty i.e. GGPS Kund Kher Abad, Nowshera. Copy of the order dated 15.12.2015 is attached as annexure.....**F.**
- 7- That the appellant feeling aggrieved from the impugned order dated 02.12.2014 preferred Departmental appeal which was properly forwarded vide letter dated 07.04.2021 but no reply has been received so far. Copies of the Departmental appeal and forwarding letter are attached as annexure.....**G & H.**
- 8- That the appellant feeling aggrieved and having no other remedy but to file the instant service appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 02.04.2014 is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the respondents acted in arbitrary and malafide manner while issuing the impugned order dated 02.04.2014 by degrading/downgrading the appellant from the post of PSHT (BPS-15) to the post of PST (BPS-12).
- D- That the respondent No.4 issued the impugned order dated 02.04.2014 without any lawful excuse and justification, therefore the same is not tenable in the eye of law, hence liable to be set aside.
- E- That the respondent Department discriminated the appellant by degrading/downgrading from the post of PSHT (BPS-15), which is clear the violation of law and rules ibid.
- F- That the impugned order dated 02.04.2014 is violative of Article-38(e) of the Constitution of Islamic Republic of Pakistan, 1973.
- G- That there is no such provision in law or rule for downgrading any civil servant from the higher post to the lower post in lieu of inter district transfer, therefore the impugned order dated 02.04.2014 is void-ab-initio.
- H- That the impugned order dated 02.04.2014 is violative of the principle of natural justice.
- I- That the appellant seeks permission to advance any other ground at the time of hearing.

It is therefore, most humbly prayed that the appeal of appellant may be accepted as prayed for.

Dated: 23.06.2021.

APPELLANT


LILA RANI

THROUGH:


MIR ZAMAN SAFI
ADVOCATE

CERTIFICATE:

It is certified that no other earlier appeal was filed between the parties.



DEPONENT

LIST OF BOOKS:

- 1- CONSTITUTION OF PAKISTAN, 1973
- 2- SERVICES LAWS BOOKS
- 3- ANY OTHER CASE LAW AS PER NEED

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

APPEAL NO. _____/2021

LILA RANI


VS

EDUCATION DEPTT:

AFFIDAVIT

I Mir Zaman Safi, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this **service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.




MIR ZAMAN SAFI,
Advocate
High Court, Peshawar

BETTER COPY OF PAGE-6

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BANNU

APPOINTMENTS:

Appointments of the following PTC trained but un-certificated candidates are hereby ordered in BPS-7 @ Rs. 1480/- PM fixed plus usual allowances as admissible under the rules on the terms and conditions given below with effect from taking over charge i.e. 11.4.96 in the schools mentioned against each in the interest of public service.

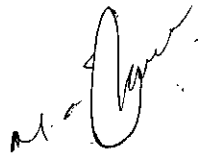
S#	Name of candidate	Name of school	Remarks
1.	Miss. Zenab Kaleem D/O Noor Mohammad, Ismail Khani	GGPS Akhundani, Bada Khel	NCP
33.	Miss. Lila Rani D/O Das Chand, Kot Adil Colony	GGPS Fazal Haq Malwana	V. Post

MRS. PARVEEN AKHTAR BALOCH
DISTRICT EDUCATION OFFICER
(FEMALE), PRIMARY BANNU

Endst: No. 804-49/A-I/1996

Dated Bannu the 02/04/1996

ATTESTED



(1)

~~3/5~~

A-60

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) M.Y. BANNU.

APPOINTMENT.

Appointments of the following P.T.C. Trained but Un-Certificated candidates are hereby ordered in EPS-7 @ Rs. 1480/- PM Fixed plus usual allowances as admissible under the rules on the terms and conditions given below with effect from taking over charges i.e. 11.4.96 in the schools mentioned against each in the interest of public service.

P.F-60

No.	Name of candidate.	Name of School.	Remarks.
1.	Miss Lenab Khatun D/O Mir Muhammad, Ismail Khel.	GGPS, Achundan Bada Khel	NCP.
2.	Miss Noor Gul D/O Mir Abbas.	GGPS, Zalim Mandan.	NCP.
3.	Miss Malima Nisai D/O Dilawan Bada Mir Abbas.	GGPS, Gul Khan Mirzali Khel.	V. Post.
4.	Miss Noor Kamala D/O Ghulam Samdani, Ismail Khel.	GGPS, Ayaz, Zalim Mandan.	NCP.
5.	Miss Nafis Anjam D/O Zardad Khan, Syed Tughal Khel.	GGPS, Syed Tughal Khel.	V. Post.
6.	Miss Shabnam Kana D/O Aftab Khan, Ismail Khel.	GGPS, Ayaz Mira Khel.	V. Post.
7.	Miss Nazreen Bibi D/O Muhammad Nazif, Kotka Drug Khel.	GGPS, Beri Khel.	V. Post.
8.	Miss Shakila Quershi D/O Habib-Ur-Rehman, Ismail Khel.	GGPS, Zalim Dalo Khel.	V. Post.
9.	Miss Shazia Quershi D/O Habib-Ur-Rehman, Ismail Khel.	GGPS, Zalim Dalo Khel.	V. Post.
10.	Miss Jamshed Begum D/O Hayatullah Khan, Ismail Khel.	GGPS, Bazid Tughal Khel.	V. Post.
11.	Miss Hussan Taj D/O Mujahid Shah, Piran Tughal Khel.	GGPS, Bhangi Khan Khujari.	V. Post.

P.F-59

12.	Miss Gul Hanifa D/O Mir Rasool Khan Ghoriwala.	GGPS, Hassan Khel Jaffer Khan.	V. Post.
13.	Miss Nagina Bibi D/O Sher Dad Khan, Ghoriwala.	GGPS, Luban Khujari.	V. Post.
14.	Miss Mehnas Begum D/O Abdul Qayum Khan, Ghoriwala.	GGPS, Titter Khel Banochi.	V. Post.
15.	Miss Iqbal Begum D/O Sher Dad Khan, Ghoriwala.	GGPS, Sher Gul Khujari.	V. Post.
16.	Miss Zahida Ambreen D/O Sagar Din, Serai Naurang.	GGPS, Nar Faqir Rasool.	V. Post.
17.	Miss Balqis Begum D/O Sher Dad Khan, Ghoriwala.	GGPS, Sher Gul Khujari.	V. Post.
		GGPS, Nur Falak Khel.	V. Post.

APPROVED

[Signature]

19.	Miss Rozina Shaheen D/O Munawar, Mir Hashim Khujeri.	GGPS, Zeri Gul Kakki.	NCP.
20.	Miss Farhat Naz, D/O Muqarrab Khan, Nar Pir Abas.	GGPS, Nar Sher Mast.	V. Post.
21.	Miss Noor Khitab Parveen D/O Qamer Zaman, Ghoriwala.	GGPS, Gaba Khel.	NCP.
22.	Miss Salqis Begum D/O Shahidullah, Manja Khel Taji Killa.	GGPS, Kotka Najibullah, Ghoriwala.	V. Post.
23.	Miss Gulshan Ara D/O Mezrat Zaman, Ghoriwala.	GGPS, Haji Mearez Killa.	V. Post.
24.	Miss Anaisa D/O Muhammad Zaman, Shaabaz Azmat Khel.	GGPS, Khujari Babar.	V. Post.
25.	Miss Elnot Sikandri D/O Shah Ali Sikandri, Shaabaz Azmat Khel.	GGPS, Kotka Behram Shah.	V. Post.
26.	Miss Aida Arifa D/O Bahader Nawaz Killa.	GGPS, Shagi Michen Khel.	V. Post.
27.	Miss Noomana Begum D/O Muhammad Ismail, Kakki.	GGPS, Zeri Gul Kakki.	NCP.
28.	Miss Parveen Akhtar D/O Muhammad Azam, Nar Najib.	GGPS, Kotka Mehbooba.	NCP.
29.	Miss Farzana Akhtar D/O Muhammad Azam, Dheri Killa.	GGPS, Kotka Mehbooba.	NCP.
<u>P.F-58.</u>			
30.	Miss Renana Tabasum D/O Muhammad Yaqoob Bannu City.	GGPS, Banaraz J. Loloza.	NCP.
31.	Miss Farida Bano D/O Nasirud Din Bannu City.	C.M.S, Bodin Khel.	V. Post.
32.	Miss Zehida Kousar D/O Ghulam Hussain Bannu City.	GGPS, Khadri Muhammad Khel.	V. Post.
33.	Miss Lila Rani D/O Das Chand Kot Adil Colony.	GGPS, Fazal Haq Malwana.	V. Post.
34.	Miss Zakira Bibi D/O Hamidullah Tehsil Galli Bannu.	GGPS, Gankot Sagi.	V. Post.
35.	Miss Naheed Begum D/O Fazal Hakim Shah College Street Bannu.	GGPS, Haibak Sherza Khan (Mir Wali Khan)	V. Post.
36.	Miss Shazia Gul D/O Anrangzeb Tenchi Bazar Bannu City.	GGPS, Mandori Matullah Shah.	V. Post.
37.	Miss Akhtar Bano D/O Habibullah I/S Casaban Gate Bannu	GGPS, Fazal Haq Malwana. (Dr. Abad)	NCP.
38.	Miss Meher Taj D/O Meher Gul. Toorka Azad.	GGPS, Toorka Azad Khan.	NCP.
39.	Miss Nazmeen D/O Akhtar Zaman Mandozai.	GGPS, Mandozai.	NCP.
40.	Miss Robina D/O Noor Zali Shah Shehbaz Shah Sheikhhan.	GGPS, Noor Mali.	NCP.
41.	Miss Rafia Begum D/O Mir Zardad Sheikhhan.	GGPS, Noor Mali.	NCP.
		GGPS, Sher Nowaz.	NCP.

B

8

	Miss Gul Samina D/O Muhammad Ali, Moh: Lunshian Bannu.	GGPS, Nek Nawaz Nurar.	NCP.
	Might Hamid D/O Hamidullah H.No. 36/A I/S Qasaban Gate.	GGPS, Nusrat Daud Shah.	NCP.
45.	Mehmaz Gul D/O Rukh Niaz Bazar Ahmad Khan.	GGPS, Beli Killa.	V. Post.
46.	Bimla Rani D/O Amar Nath Moh: Kastodaim Bannu.	GGPS, Haved Khass.	V. Post.
47.	Miss Noor Shad D/O Muhammad Daraz Hinjal Amir Khan.	GGPS, Sarwar Patch Khel.	V. Post.
48.	Miss Khubana D/O Sher Khan. Bazar Ahmad Khan Jaidi Abadi.	GGPS, Babi Jan Denderiz.	V. Post.
49.	Miss Gulshan Ara D/O Irtiaz Khan Moh: Qasaban Jen.	GGPS, Nusrat Daud Shah.	NCP.
	Miss Gulshan Ara D/O Irtiaz Khan Moh: Qasaban Jen.	GGPS, Fazal Haq Malwana (Dr: Abad)	NCP.
	Miss Gulshan Ara D/O Irtiaz Khan Moh: Qasaban Jen.	GGPS, Haq Daud Haqbool.	NCP.
51.	Miss Gulshan Ara D/O Irtiaz Khan Moh: Qasaban Jen.	GGPS, Zotka Feroz Irtiaz.	V. Post.
52.	Miss Gulshan Ara D/O Irtiaz Khan Moh: Qasaban Jen.	GGPS, Zotka Feroz Irtiaz.	V. Post.
53.	Miss Gulshan Ara D/O Irtiaz Khan Moh: Qasaban Jen.	GGPS, Qamer Aman Mandev.	NCP.
54.	Miss Gulshan Ara D/O Irtiaz Khan Moh: Qasaban Jen.	GGPS, Dabek Syed Khel (Sher Muhammad)	NCP.
55.	Rozia Akhter D/O Mehrullah. College Street Bannu.	GGPS, Mansoor Bazida Kokal Khel No. 2.	NCP.
56.	Rabia Tabesum D/O Saïd Ahmad Mandozei.	GGPS, Shahbaraz Mandev	V. Post.
57.	Miss Farida Bedum D/O Abdul Ghani H.No. 452/D Moh: Faqiren Hinjal Gate.	GGPS, Saifur Rehman Nurar.	V. Post.
58.	Miss Umar Shad D/O Waris Khan H.No. 450/D Moh: Faqiren.	GGPS, Khawaja Mad Landidak	V. Post.
59.	Taman Zari D/O Amal Jan Tanchi Bazar Bannu.	GGPS, Saidan Denderiz.	V. Post.
60.	Miss Meher Angez D/O Mir Alam Hinjal Amir Khan.	GMS, Bodin Khel.	NCP.
61.	Ambareen D/O Zar Gul Khan Mula Khel Sursanu.	GMS, Bodin Khel.	NCP.
62.	Nazir Fatma D/O Sher Nawaz Jan Killa Sursani.	GGPS, Zeba Khel Khujari	V. Post.
63.	Basro Jana D/O Muhammad Arif Kot Daim Daim.	GGPS, Noon Shab Khan.	V. Post.
64.	Miss Rizwan Jehan D/O Qazi Abdul Bazar Ahmad Khan.	GGPS, Pir Sakhi Zaman.	V. Post.
65.	Miss Bushra Ayaz D/O Noor Ayaz. Moh: Karim Dad.	GGPS, Pak Ismail Khel.	NCP.
66.	Miss Jamila Satar, D/O Abdul Star. Gharib Abad.	GGPS, Pak Ismail Khel.	NCP.
67.	Miss Bibi Razia D/O Abdul Star. Gharib Abad.		

- | No. | Name | Address | Organization | Post |
|-----|-----------------------|---|---|----------|
| | Miss Shahnaz Akhtar | D/O Khan Zada
H.No.322/B I/S Hinjal Gate. | GGPS, Mir Waiz Nurar. | V. Post. |
| | Miss Parveen Akhtar | D/O Zahir-Ud-Din
H.No.662/D Hannu City. | GGPS, Mir Waiz Nurar. | V. Post. |
| | Miss Salma Kanwal | D/O Muhammad Yaqoob
C/O Gul Muhammad Chowkidar. | Mandev Khass. | V. Post. |
| | Miss Nighat Sima Jana | D/O Faujdar, H.No.356/E Moh: Sheikh Salim Bannu. | Pir Sakhi Lanan. | V. Post. |
| | Miss Nasim Begum | D/O Sher Bad Shah
H.No.244/D Moh: Rab Nawaz Bannu. | GGPS, Mir Atlas Haved. | V. Post. |
| | Miss Samina Akhtar | D/O Ghafar Ali
H.No.628/D Moh: Munshian Bannu City. | GGPS, Haibak Sherza Khan. | V. Post. |
| | Miss Rozina Begum | D/O Kamatullah
Mandozai. | GGPS, Mandozai. | V. Post. |
| 5. | Miss Farhana Ajmal | D/O Ajmal
Muhammad Ajmal Auditor Jang Newspapers | GGPS, Amandi Umar Khan. | V. Post. |
| 6. | Miss Hafiz Shaheen | D/O Raj Muhammad
H.No.605/C Meer Chapper Lana Bannu. | GGPS, Khadri Muhammad Khil -do- | |
| 7. | Miss Rozana Begum | D/O Dost Muhammad
H.No.58/B | GGPS, Khawajamad Landidak -do- | |
| | Miss Ghafar Ali | | GGPS, Mumbati Barakzai. | V. Post. |
| | Miss Saadullah | | GGPS, Sero Lada Khel. | V. Post. |
| | Miss Saadullah | | GGPS, Ragheb Khan
Khawajamad Landidak. | V. Post. |
| 80. | Miss Nukhsana | D/O Amal Khan
H.No.294/D Tanchi Bazar Bannu. | GGPS, Ragheb Khan
Khawajamad Landidak. | V. Post. |
| 81. | Miss Tehmina Naz | D/O Muhammad
Ghulam H.No.525/D J/Road Bannu. | GGPS, Ragheb Khan
Khawajamad Landidak. | V. Post. |
| 82. | Miss Irfan Gul | D/O Noor Muhammad
H.No.274/D Moh: Arya Samaj. | GGPS, Hukam Zed Dardariz. | V. Post. |
| 83. | Miss Asfer Chaman | D/O Chaman Bhati
C/O Chila Sadiq GMS No.2. | GGPS, Bharat Khass. | V. Post. |
| 84. | Miss Asia Naheed | D/O Iman Baksh
H.No.317/B Hinjal Gate Bannu. | GGPS, Reghab Khan
Khawajamad Landidak. | V. Post. |
| 85. | Miss Fozia | D/O Balqiaz
Wanda Ghafar Toorks. | GGPS, Wand Ghafar. | V. Post. |
| 86. | Miss Nazmin | D/O Mazullah.
Kechozai Nizam Bazar. | GGPS, Soakot Haqi | V. Post. |
| 87. | Miss Shahana Hamid | D/O Abdul Hamid H.No.90/D Moh:
Hafizan Phori Gate. | GGPS, Saifur Lehman
Nurar | V. Post. |
| 88. | Miss Samina Zada | D/O Mir Salem Shah
H.No.302/C Bannu City. | GGPS, Mir Atlas Haved. | V. Post. |
| 89. | Miss Irshad Begum | D/O Momin Gul
H.No.23/E Moh: Abdul Sattar. | GGPS, Mir Atlas Haved.
Mama Khel. | V. Post. |
| 90. | Miss Fazilat | D/O Sarfaraz Khan
Bazar Ahmad Khan. | GGPS, Haibak Sherza Khan. | V. Post. |
| 91. | Miss Nishat Parveen | D/O Muhammad Daraz. | GGPS, Kousar Faten Khel. | V. Post. |

.....

(Handwritten signature)

E.P-60

Masum Quershi D/O ~~Terminated~~ B. Bazid Tughal Khel.
Habib-Ur-Rehman.

V. Post

Murshid Begum D/O ~~Terminated~~ G.P.S. Bahawal Khujari.
Atta Muhammad Khan

NOP

Mehat Parveen D/O ~~Terminated~~ G.P.S. Ghulam Mughal Khel.
Ghazi Mar Jan.

V. Post

TERMINATION CONDITIONS:-

- 1) If allowed to any one being 1st appointment.
- 2) Medical certificate should be produced from Medical Officer within quarter annum.
- 3) If not produced over 18 their ages below 18 years or above 45 years should be checked before handing over.
- 4) If on temporary basis and liable to terminate on any ground, the notice/reason.
- 5) They will not apply for transfer before completion of their tenure in the existing schools.

(MRS. FARVEEN AKHTAR BALOCH)
DISTRICT EDUCATION OFFICER
(FEMALE) PRIMARY BANNU.

Order No. 804-49 /A-I/1996

Dated Bannu the 02/04 /1996

Copy forwarded for information to:-

- 1:- Director Primary Education N.W.F.F. Peshawar.
- 2:- Distt: Accounts Officer Bannu.
- 3:- Sub Divl: Education Officer (Female) Bannu.
- 4:- The all concerned.

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE) PRIMARY BANNU.

[Handwritten signature]

TO WHOM IT MAY CONCERN

B-11

It is certified that Mr Santosh Kumar is Government employee and permanently serving in 1 Training Regiment Artillery Centre Attock since Aug 1999. The individual is residing in Attock (Punjab) and is citizen of Pakistan.



Attock

3 October 2005

[Handwritten signature]
Cap
QM
1st Regt Artillery Centre

ATTESTED

[Handwritten signature]

C-12

- 1. Name (نام) لیلا رانی
- 2. Nationality and Religion پاکستانی ہندو
(قومیت اور مذہب)
- 3. Residence (رہائش گاہ) لاہور
- 4. Father's name and residence عادل گل خان
(والد کا نام اور رہائش گاہ)
- 5. Date of birth by Christian era as nearly as can be ascertained 28-2-72
(تقریباً پیدائش کا تاریخ سن ہجری)
- 6. Exact height by measurement 5-3
(قد کی پیمائش)
- 7. Personal mark of identification بائیں ہاتھ پر زخم گائے
(ذاتی نشانہ)

8. Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)
 (دو ہاتھوں کی انگوٹھوں کے نشانات)

Little Finger (چھٹکلیا) Ring Finger (چھٹکلیا کے ساتھ کی انگوٹھ) Middle Finger (انگوٹھ بیانیہ)

Fore Finger (انگوٹھ شہادت) Thumb (انگوٹھ)

9. Signature of Govt. Servent لیلا رانی

10. Signature and designation of the Head of the Office or other Attesting officer
Sub-Divisional Education Officer (Female) Rawalpindi

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.

نوٹ: اس صفحہ پر درج کیے گئے تمام تفصیلات کو کم از کم ہر پانچ سالوں میں تجدید یا دوبارہ تصدیق کرنا ضروری ہے اور لائنوں 9 اور 10 میں درج کیے گئے دستخطوں کے ساتھ تاریخ لکھنی چاہئے۔ انگوٹھوں کی پیمائش ہر پانچ سالوں کے بعد اس قاعدہ کے تحت نہیں کرنی چاہئے۔

ATTESTED
M. J. Khan

Per
th
col
to
stat

det
B.No.
1. M
GG
2. M
GGI

Name of Post	Whether Substantive or officiating and whether permanent or temporary	(1) Substantive appointment or (2) whether service counts for pension under rule 3-20 of C.S.A. (Pb.) Volume II	Pay in substantive position	Additional pay for officiating	Other emoluments falling under the term pay	Date of appointment	Signature of Government servant
			Bd.	Ps.	Rs.	Ps.	
B-7C (No. 1480-97-2095)	مستقل	مستقل	1480/PM	(Fixed)	11/96	11/96	مستقل
B-9C (No. 1605-97-3060)							
Temp			1605/PM			25/96	
			1702/PM			1/96	
Cutting attached							
Wednesday 20th							
S.D.O. (F)							
(Datto)							
Temp			1400/PM			25/96	
			1561/PM			1/96	
			1642/PM			1/97	
			1723/PM			1/98	

Indst.No.
tion to t
Sub Div
Memo No.
with the
Books t
ol: (tw
lt:Accc

RECEIVED

Signature of the officer or other officiating officer in substitution of column 1 to 8	Date of termination or appointment	Reason for termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other officiating officer	Authority to which he is liable to Government	Authority to which he is liable to Government	Authority to which he is liable to Government
مستقل	24/96	Passed	مستقل	Government	Government	Government
مستقل	30/96	Passed	مستقل	Government	Government	Government
مستقل	30/96	Passed	مستقل	Government	Government	Government
مستقل	30/96	Passed	مستقل	Government	Government	Government
مستقل	30/96	Passed	مستقل	Government	Government	Government
مستقل	30/96	Passed	مستقل	Government	Government	Government
مستقل	30/96	Passed	مستقل	Government	Government	Government
مستقل	30/96	Passed	مستقل	Government	Government	Government
مستقل	30/96	Passed	مستقل	Government	Government	Government
مستقل	30/96	Passed	مستقل	Government	Government	Government

Service Verified on 30/11/96 from the record of this Office

13

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 3-20 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 of Government servant
			Rs.	Ps.	Rs.	Ps.			
درجہ ملازمت	ماریہ مستقل نام مقام	اگر ماریہ ہے تو کیا دور دوری کے مطابق پیش کش کا مستحق ہے	تقویم بطور ماریہ ملازمت	تقویم بطور ماریہ ملازمت	نام مقام	اسوائے تقویم بطور ملازمت	تاریخ تقرری	دستخط سرکاری ملازم	
P70		BPS-12	4355/-	319/-	13655/-		12/09		
			7457/-				12/2010		
		Revised scale BPS-12	12500/-				17/2011		
			13000/-				12/2011		

ATTESTED

Office of the Accountant General
 Government of Punjab
 Pay Scale: Rs. 28400/- to Rs. 72600/-
 Pay Band: Rs. 5500/- to Rs. 17655/-
 Pay Fixation: Rs. 31872.65/-
 Date of Next Increment: 01-12-2011

Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reasons of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other Attesting officer	Signature of the Head of the office or other attesting Officer	Signature of the Head of the office or other attesting Officer
دستخط سربراہ	30/09/2009	دوران خدمت	دستخط سربراہ	دستخط سربراہ	دستخط سربراہ
Primary Bannu	30/09/2009		D.D.O (F) Bannu		
D.D.O (F) Bannu	30/09/2010		D.D.O (F) Bannu		
D.D.O (F) Bannu	30/06/2010		D.D.O (F) Bannu		
D.D.O (F) Bannu	30/11/2011		D.D.O (F) Bannu		

منیجر رجسٹرڈ وہف
 17/12/2002 to 30/11/04
 from the record of
 this office.

Summary of award however
 allowed with effect 2/01/2006
 to 1/04/2006 on full pay.
 vide EPOCS/Bannu
 Govt. No. 46284-P/1/F PCE
 dated 26/12/2005

From report to Punjab Prov.
 on deputation basis for the
 period of three years vide Govt.
 of the Punjab Notification No. 20 (SR-11) G-15/2006
 dated 6/6/2006 & Govt. of Punjab
 Govt. No. 59113/05 dated 10/6/2006

15

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 3-20 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 of Government servant
			Rs.	Ps.	Rs.	Ps.			
دوبہ ملازمت	ماریس مستقل نام مقام	پروموشن کے تحت ماریس ملازمت							
Mrs. Laila Kaur D.C.									
(QAZIABAD Tehsil Attock PUNJAB)							4655	30-6-06	
	B-12		Rs.	13500/-				1/12	
B/S-14	(Rs. 8000 - 610 - 26300)		Rs.	14100				22 2/13	
1- Premature			Rs.	14710				22 2/13	
B/S-15	(Rs. 8500 - 700 - 29500)		Rs.	14800				25 2/13	
1- Premature			Rs.	15500				25 2/13	

ATTESTED

S.D.E.O. (F)
Punjab

Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting officer	Allocation of period of leave of average pay up to four months (or earned leave not 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, or reward or praised of the Government servants
دستخط سربراہ	30-6-2007	تعمیراتی منتقلی	دستخط سربراہ	حکومت کو قابل ذمہ دار	دستخط سربراہ	کوئی نہیں
INTER PROVINCIAL TRANSFER/ADJUSTMENT						
<p>Transfer of L. U (W) Tehsil Attock District Officer (Education) order No. 412/admn. Dated 28.6.2007 from Govt Girls Primary School No. 2, Bannu (NWFP) to Govt Girl Primary School Qaziabad Tehsil Attock (Punjab) with the following conditions:</p> <ol style="list-style-type: none"> No deputation allowance shall be paid. Punjab Education Department shall not deduct G.P.F and no pension/gratuity shall be paid or born by this department. Punjab Education Department shall pay to deputation as per L.P.C of the teacher. The Incumbent shall automatically deem deemed repatriated after completion of deputation period. The period of deputation is only three years. <p>She joined the post on 30-6-2007. Her period of deputation will finish on 29-6-2009.</p>						
No 1270		Date 24/1/07		Deputy District Officer Education (W) Tehsil ATTOCK		
Drawn amount of pay allowances w.e.t.		Rs. 3-13		ADAO		
To 31-5 amounting to		Rs. 2669/-				

16

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 3-20 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 of Government servant
			Rs.	Ps.	Rs.	Ps.			
رہبر ملازمت	یاری مستقل نام مقام	اگر ماری ہے تو یہ دوسری کے مطابق پیش کی گئی ہے	توڑا بلور	ماری ملازمت	زائد توڑا بلور	نام مقام	سوائے توڑا بلور اور دوس	تاریخ تقرری	دستخط سرکاری نمبر
			Revised entry						
BPS-12	Pay on 21.2.2007		Rs.				5710/-		
	14 Premitive 21.2.2007		Rs.				5970/-		
Pay Revised on	1.7.2008		Rs.				7145/-		
	Alive 1.12.2008		Rs.				7455/-		
	1.12.2009		Rs.				7765/-		
	1.12.2010		Rs.				8075/-		
Pay Revised on	1.7.2011		Rs.				13000/-		
	Alive 1.12.2011		Rs.				13500/-		
	1.12.2012		Rs.				14000/-		
BPS-15	Pay on 25.2.2013		Rs.				14100/-		
	14 Premitive 25.2.2013		Rs.				14800/-		
	Alive 1.12.2013		Rs.				15500/-		

Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Period	Signature of the Head of the office or other attesting Officer	Punishment or censure, or reward or praised of the Government servants
دستخط سرکاری نمبر	تاریخ تقرری ملازمت	درجہ ترقی تیار رہی ہے	دستخط سرکاری نمبر	رفتہ کی مدت دسیار		دستخط سرکاری نمبر	سزا یا سزاوارہ یا سزاوارہ

Degraded & placed
 w.e.f. 18/10/2014
 (46) day on P.P. vide
 DPO (P) - Enst. No. 3877-78
 Dated - 11-10-2014

S.D.E.O (P)
 P. Bannu

Degraded & placed from
 BPS-12 to BPS-12 in connection
 with increase in pay scale
 from Dist. Bannu to Dist.
 Nowshera vide sanction
 D.P.O (P) Secretary P. Bannu
 Enst. No. 4495/497
 dt. 02-12-2014

S.D.E.O (P)
 P. Bannu

17

D 18

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11-7-2012 the following Senior Primary School Teachers BPS-14 are hereby promoted to the post of Primary School Head Teachers(PSHT) BPS-15 (8500-700-29500) plus usual allowances as admissible under the Rules & regular basis under the existing Policy of the Provincial Government, in teaching cadre on the terms & condition given below with immediate effect and further posted in the schools noted against each.

S.#	Name of Teacher	Father Name	Present School		Place of posting		Remarks
1	Hamida Begum	Sher Daraz khan	GGPS	Shabaz Azmat Khel	GGPS	Shabaz Azmat Khel	Newly converted/created
2	Dil Parshad Begum	Sardar ali khan	GGPS	Bannu city No.3	GGPS	Bannu city No.3	Newly converted/created
3	Khan Malooqa	Nabi Shah	GGPS	Bannu city No.3	GGPS	Bannu city No.3	Newly converted/created
4	Ghazala Jabeen	Atiq Ali	GGPS	Bannu City No.4	GGPS	Kotka Juma Khan	Newly converted/created
5	Rafia Begum	Ghulam yasin	GGPS	Bannu City No.2	GGPS	Bannu City No.2	Newly converted/created
6	Falak Naz Shaheen	Mohammad Husain	GGPS	Mir Azam Baist Khel	GGPS	Mir Azam Baist Khel	Newly converted/created
7	Bader Rani	Bahader Ram	GGPS	Kot Beli	GGPS	Kot Beli	Newly converted/created
8	Khawazanoor Begum	Gul Rehman	GGPS	Kotka Ghulam Farid	GGPS	Kotka Ghulam Farid	Newly converted/created
9	Yasmin Akhtar	Ghulam Nabi	GGPS	Bannu City No.5	GGPS	Bannu City No.5	Newly converted/created
10	Bas Bibi	Badshah Khan	GGPS	Bannu City No.5	GGPS	Panakzai	Newly converted/created
11	Shamshad begum	Sardar ali khan	GGPS	Bannu city No.3	GGPS	Sher Andaz Daud Shah	Newly converted/created
12	Shanaz Begum	Bahader Khan	GGPS	Ibrahim Khel No.2	GGPS	Khedri Mohd Khel Sher Ali	Newly converted/created
13	Rihana Parveen	Sadaqat Mohammad Khan	GGPS	Bannu city No.3	GGPS	Mito Khan Landidak	Newly converted/created
14	Bader Un Nisa	Ghulam Qader	GGPS	Sokari Bahader	GGPS	Sokari Bahader	Newly converted/created
15	Mir Zarizada	Akber Zaman	GGPS	Amin Mughal Khel	GGPS	Amin Mughal Khel	Newly converted/created
16	Shamsun Nahar	Mir Rasool	GGPS	Hasan Khel Jafer	GGPS	Hasan Khel Jafer	Newly converted/created
17	Zohra Bibi	Sarwar Shah	GGPS	Ghoriwala Khas	GGPS	Ghoriwala Khas	Newly converted/created
18	Zaibun Nisa Khatak	H.Ghulam Mahiyud din	GGPS	Kot Barara	GGPS	Kot Barara	Newly converted/created
19	Farhad Begum	Damsaz Khan	GGPS	Sero Bada Khel	GGPS	Sero Bada Khel	Newly converted/created
20	Robina Bukhari	Dost Mohammad	GGPS	Kacha Bachak	GGPS	Kacha Bachak	Newly converted/created
21	Dilshad Begum	Sader Din	GGPS	Shukrullah Beri Khel	GGPS	Shukrullah Beri Khel	Newly converted/created
22	Ifat Mahjabeen	Noor Islam	GGPS	Ihsan Pirdel Khel	GGPS	Ihsan Pirdel Khel	Newly converted/created
23	Noor Husanzad	Syed Rasool	GGPS	Kotka Mir Akram Shah	GGPS	Kotka Mir Akram Shah	Newly converted/created
24	Musarat Jabeen	Asad Ali Khan	GGPS	Bannu City No.4	GGPS	Timur Shah Mitha Khel	Newly converted/created
25	Asmat Jehan	Ghulam Mahyud Din	GGPS	Bannu City No.1	GGPS	Bannu City No.1	Newly converted/created
26	Shamim akhtar	Mohammad Nawaz	GGPS	Kotka Khajan	GGPS	Kotka Khajan	Newly converted/created
27	Zeenat Begum	Hakim Sherin Zaman	GGPS	Degan Shadi Khan	GGPS	Kotka Babo Jan Surani	Newly converted/created
28	Sakina Qureshi	Ianayatullah Khan	GGPS	Fatima Khel Khurd	GGPS	Fatima Khel Khurd	Newly converted/created
29	Husanzada	Assadullah Khan	GGPS	Garhi Sher Ahmad	GGPS	Garhi Sher Ahmad	Newly converted/created
30	Ishrat Parveen	Raja Abdur Razaq	GGPS	Bannu City No.5	GGPS	Pir Ali Marjan	Newly converted/created
31	Gul Sherin	Noor Azam Shah	GGPS	Hakoomat Khan	GGPS	Mouladad Mamash khel	Newly converted/created
32	Shagufta bibi	Noor Azam Shah	GGPS	Bannu City No.3	GGPS	Ibrahim Khel No.1	Newly converted/created
33	Tabassum Fayaz	Mohammad Fayaz	GGPS	Arsela Michan Khel	GGPS	Arsela Michan Khel	Newly converted/created
34	Rukhsana Qadir	Qadir Masih	GGPS	Boza Khel No.2	GGPS	Boza Khel No.2	Newly converted/created
35	Gulabun Nisa	Kamil Habib Khan	GGPS	Fatima Khel	GGPS	Fatima Khel	Newly converted/created
36	Zeenat Qalsoom	Mohammad Sarwar	GGPS	Bannu City No.4	GGPS	Bannu City No.4	Newly converted/created
37	Kosar Naznin	Salamat Ali	GGPS	Mama Khel Bannuchi	GGPS	Mama Khel Bannuchi	Newly converted/created
38	Kishwar Sultana	Ghous Ali Khan	GGPS	Bazar Ahmad Khan	GGPS	Bazar Ahmad Khan	Newly converted/created
39	Robina Begum	Mohammad Subhan	GGPS	Wali Zaman Kakki	GGPS	Wali Zaman Kakki	Newly converted/created
40	Razia Daud	Ghulam Daud	GGPS	Bannu City No.4	GGPS	Hukamzad Dardar	Newly converted/created
41	Razia Shaheen	Hakim Sherin Zaman	GGPS	Khashni Kila Ghani	GGPS	Khashni Kila Ghani	Newly converted/created

ATTESTED
[Signature]



Sl. No.	Name of Teacher	Father Name	Present School		Place of posting		Remarks
234	Nighat Seema	Ayub Nawaz	GGPS	Azghafar Kakki	GGPS	Kutan Haji Majan Kakki	Newly converted/created pos
235	Shabana Begum	Hayatullah Khan	GGCMS	Kosar Fateh Khel	GGPS	Amir Waiz Nurar	Newly converted/created pos
236	Farzana Begum	Dost Mohammad	GGPS	Bannu City No.4	GGPS	Haved Khas	Newly converted/created pos
237	Firdous Begum	Syed Nawaz	GGPS	Mandoori Pathal Shah No.1	GGPS	Mandoori Pathal Shah No.1	Newly converted/created pos
238	Nizakat Niazi	Amanullah Khan	GGPS	Garhi Sher Ahmad	GGPS	Kotka Aqlim Khan	Newly converted/created pos
239	Abida bibi	Mohammad Ashraf	GGCMS	Hayat Mohammad Khel	GGPS	Sardali Mohd Khel	Newly converted/created pos
240	Surayya Begum	Nazer Din	GGPS	Imai Khel issaki	GGPS	Emel Khel Isaki	Newly converted/created pos
241	Shabnum Rana	Attab Khan	GGPS	Kakki Khas No.1	GGPS	Kakki Khas No.1	Newly converted/created pos
242	Shazia Hina	Shauqat Masih	GGPS	Lewan Dardariz No.2	GGPS	Lewan Dardariz No.3	Newly converted/created pos
243	Shaheen Kosar	Abdul Qayum	GGPS	Hakim Kila Mamash Khel	GGPS	Aladad Mamash Khel	Newly converted/created pos
244	Zahida Bibi	Amin Jan	GGPS	Kotka Misaldad Azim Kila	GGPS	Kotka Misaldad Azim Kila	Newly converted/created pos
245	Lila Rani	Das Chand	GGPS	Fazal Haq Malwana No.2	GGPS	Fazal Haq Malwana No.2	Newly converted/created pos
246	Ulfat Sikanderi	Ashraf Ali Sikanderi	GGPS	Basia Khel	GGPS	Gul Maizar Inam	Newly converted/created pos
247	Farida Begum	Abdul Ghani	GGCMS	Kosar Fateh Khel	GGPS	Akbar Ali Nurar	Newly converted/created pos
248	Noor Kamala	Ghulam Samdani	GGPS	Ayaz Zalim Mandan	GGPS	Ayaz Zalim Mandan	Newly converted/created pos
249	Samina Zada	Mir Salim Shah	GGPS	Syed Abad Mamash Khel	GGPS	Syed Abad Mamash Khel	Newly converted/created pos
250	Nafis Anjam	Zardad Khan	GGCMS	Kosar Fateh Khel	GGPS	Khani Kila Molvi Amirjan	Newly converted/created pos
251	Fozia Akhtar	Mehrullah Khan	GGPS	Sharif Jadid S.Naurang	GGPS	Sharif Jadid S.Naurang	Newly converted/created pos
252	Meharaj	Mehar Gul	GGPS	Toorka Azad Khan	GGPS	Toorka Yaqoob Nawaz	Newly converted/created pos
253	Balqis Begum	Shahidullah Khan	GGPS	Manja Khel	GGPS	Manja Khel	Newly converted/created pos
254	Rukhasana	Amal Jan	GGPS	Inki Mamash Khel	GGPS	Hakoomat Khan	Newly converted/created pos
255	Tahira Begum	Mohammad Anwar	GGPS	Wali Zaman Kakki	GGPS	Sher Gul Khujari	Newly converted/created pos
256	Nazmin Begum	Mazullah Khan	GGPS	Sarwar Ghazni Khel	GGPS	Sarwar Ghazni Khel	Newly converted/created pos
257	Gulshan Ara	Hazrat Zaman	GGCMS	Ayub Ghoriwala	GGPS	Zargul Saiful Khel	Newly converted/created pos
258	Naz Gul	Tawab Khan	GGPS	Bada Mir abas Khan	GGPS	Gul Khan Mirzali Khan	Newly converted/created pos
259	Baskhubana	Mohammad sher Khan	GGPS	Bannu city No.3	GGPS	Madi Bezan Khel	Newly converted/created pos
260	Umershad	Waris Khan	GGPS	Bannu City No.4	GGPS	Matan Sabo Khel	Newly converted/created pos
261	Haleema bibi	Delawar Khan	GGPS	Shamadi Kila	GGPS	Shamadi Kila	Newly converted/created pos
262	Romana Begum	Mohammad Ismail	GGPS	Syed Tughal Khel	GGPS	Syed Tughal Khel	Newly converted/created pos
263	Rizwana Jehan	Q.Abdul Malik	GGPS	Khawajamad Mandan	GGPS	Gul Baz Khan Mandan Abdullah	Newly converted/created pos
264	Mal Afsara	Ghulam Sardar	GGPS	Kotka Feroz Imtiaz	GGPS	Kotka Feroz Imtiaz	Newly converted/created pos
265	Tehmina Naz	Ghulam Mohammad	GGPS	Sokari Karim Khan	GGPS	Mir Baz Barazai	Newly converted/created pos
266	Fakhrun Nisa	M.Abdur Rauf	GGPS	Banaraz Jehangir Lalozai	GGPS	Gharib Nawaz Lalozai	Newly converted/created pos
267	Rahat Robina	Foujdar	GGPS	Amandi Shah Jehan	GGPS	Amandi Sader Shah	Newly converted/created pos
268	Gul Samina	Mohammad ali Khan	GGPS	Shamtiarz Kala Khel	GGPS	Gul Baz Khan Atlas Khan	Newly converted/created pos
269	Guishan Ara	Imtiaz Khan	GGPS	Habibullah Floor Mill	GGPS	Habibullah Floor Mill	Newly converted/created pos
270	Mumtaz bibi	Payio Jan	GGPS	Bannu City No.2	GGPS	Haved Molvi Anwar Shah	Newly converted/created pos
271	Safia Shaheen	Taj Mohammad	GGCMS	Hayat Mohammad Khel	GGPS	Akhudan Daud Shah	Newly converted/created pos
272	Zahida Ambreen	Sader Din	GGPS	Taji Kila No.2	GGPS	Mir Qader Kila	Newly converted/created pos
273	Irfana gul	Noor Mehmood Khan	GGPS	Bannu city No.3	GGPS	Mir Baz Barazai Shah Qiaz	Newly converted/created pos
274	Shaista Begum	Roahan Khan	GGPS	Imai Khel Issaki	GGPS	Siema Sikanderi Khel	Newly converted/created pos
275	Niaz Amin	Mir Madad Khan	GGPS	Sokari Karim Khan	GGPS	Sokari Karim Khan	Newly converted/created pos
276	Naznin Akhtar	Akhtar Zaman	GGPS	Kotka Sohbat Khan	GGPS	Kotka Sohbat Khan	Newly converted/created pos
277	Farhada Jabeen	Mohammad Yaqoob	GGPS	Deri Gandi	GGPS	Deri Gandi	Newly converted/created pos
278	Naznin Bibi	Mohammad Nzaif	GGPS	Kalan Tughal Khel	GGPS	Kalan Tughal Khel	Newly converted/created pos
279	Fozia	Balqiaz Khan	GGPS	Pir Sabir Shah	GGPS	Pir Sabir Shah	Newly converted/created pos
280	Gul Hanifa	Mir Rasool	GGPS	Hasan Khel Jafer	GGPS	Taji Kila No.2	Newly converted/created pos
281	Zainub Kalsoom	Noor Mohammad Khan	GGPS	Ismail Khani	GGPS	Ismail Khani	Newly converted/created pos

(Handwritten signature)

20

Name of Teacher	Father Name	Present School	Place of posting	Remarks
282 Astar Chaman	Chaman Batti	GGPS Hakim Bharat	GGPS Shabury Bharat	Newly converted/created
283 Syeda Mehnaz	Syed Iqbal Husain Shah	GGPS Mandoori Pathal shah No.2	GGPS Sirmast Mira Khel	Newly converted/created
284 Asma Begum	Zafer Ali	GGPS Bannu Cannit	GGPS Spina Tangi No.1	Newly converted/created
285 Sirtaj Begum	Abdur Rehman	GGPS Habib Nawaz Serki Khel	GGPS Habib Nawaz Serki Khel	Newly converted/created
286 Razia Sultana	Shahazda Khan	GGPS Sher Abas Azim Kila	GGPS Kotka Raj Ali Azim Kila	Newly converted/created
287 Rozina Begum	Nimatullah Khan	GGPS Shabaz Azmat Khel	GGPS Shabaz Azmat Khel Muqader	Newly converted/created
288 Zaibun Nisa	Mohammad Zaman	GGPS Mirbaz Barakzai No.1	GGPS Mirbaz Barakzai No.1	Newly converted/created
289 Jabeen Akhtar	Mohammad Afzal	GGPS Khedri Mohd Khel Shah Jehan Shah	GGPS Khedri Mohd Khel Shah Jehan Shah	Newly converted/created
290 Gulshan Khan	Ghulam Ghani	GGPS Sardar Sabo Khel	GGPS Sardar Sabo Khel	Newly converted/created
291 Basro Jana	Mohammad Arif Khan	GGPS Kot Adil	GGPS Kot Adil	Newly converted/created
292 Khisroon Bibi	Zard Ali Khan	GGPS Manja Khel	GGPS Nar Mir Afzal Khan	Newly converted/created
293 Najma Begum	Sadatullah	GGPS Shabaz Azmat Khel	GGPS Shabaz Azmat Khel	Newly converted/created
294 Farzana	Shah Zar Khan	GGPS Garera Shah Jehan	GGPS Usman Daud Shah	Newly converted/created
295 Rafia Begum	Mir Zardad Shah	GGPS Gul Ahamd shah No.1	GGPS Taj Domei	Newly converted/created
296 Akhtar Naveed	Abdur Rauf	GGPS Mirabat Kakki	GGPS Mirabat Kakki	Newly converted/created
297 Robina Nawaz	Rab Nawaz Khan	GGPS Kotka Sardar Ali	GGPS Kotka Sardar Baik Khel	Newly converted/created
298 Mahjabeen	Abdur Rehman	GGPS Bannu City No.1	GGPS Wreshmini Kila Mandan	Newly converted/created
299 Amna Bibi	Nasrullah Jan	GGPS Hathhi Khel Bannuchi	GGPS Sikander Bharat	Newly converted/created
300 Shaheen	Fazal Subhan	GGPS Bazar Ahmad Khan	GGPS Awan Gamber	Newly converted/created
301 Bibi Razia	M.Mohammad Yaqoob	GGPS Fazal Shah Shamshi Khel	GGPS Fazal Shah Shamshi Khel	Newly converted/created
302 Rukhtaj Akhtar	Akhtar zaman	GGPS Kot Beli	GGPS Zerki Pirba Khel	Newly converted/created
303 Nuzhat Shazia	Mqbool Rehman	GGPS Bazar Ahmad Khan	GGPS Kotka Nazid Ullah K.Khela	Newly converted/created
304 Mienhas Begum	Mohammad Anwar	GGPS Pir Khel Kakki	GGPS Pir Khel Kakki	Newly converted/created
305 Fozia naheed	Imam Bakhsh	GGCMS Ismaili Mama Khel	GGPS Hasan Khel Kheraki No.2	Newly converted/created
306 Irshad Parveen	Mohammad Sultan Ahmad	GGPS Bannu City No.2	GGPS Abas Khan Nurar	Newly converted/created
307 Wahida Begum	Hanif Rasool	GGPS Piran Ishaq	GGPS Piran Ishaq	Newly converted/created
308 Zeenat Naznin	Mir Awaz Khan	GGPS Sokari Karim Khan	GGPS Gul Rabani Mohd Khel	Newly converted/created
309 Anwar Begum	Gul Wali khan	GGPS Arsela Michan Khel	GGPS Shagi Michan Khel	Newly converted/created
310 Zahida Parveen	Mohd Ramzan	GGPS Kotka Juma Khan	GGPS Logman Kafshi Khel	Newly converted/created

TERMS & CONDITIONS:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules & regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case her performance is found satisfactory during probationary period. In case of misconduct, she shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-se-seniority on lower post will remain intact.
6. No TA/DA is allowed for joining her duty.
7. They will give an under taking to this effect to be recorded in their service book

Endst.No. 1047-1371

Dated 25/02/2013

District Education Officer
(Female)(E&SE) Bannu

Copy for information to the-

1. Director Elementary & Secondary Education KPK Peshawar.
2. Sub-Divisional Education Officer (F) Primary Bannu w/r to her No.258/dated 18-2-2013
3. District Accounts Officer Bannu
4. All ADO (Circles) Bannu
5. Official concerned with direction to take over charge against (Sr-PST)B-14 in their respective schools within three days positively.
6. M.File

District Education Officer
(Female)(E&SE) Bannu

E-21

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE BANNU.

OFFICE ORDER:

Consequent upon the request of Mst. Lila Rani HPST GGPS Fazal Haq Malwana No.2, received through SDEO Female Primary Bannu vide her No.3604 dated 13/10/2014, Sanction is hereby accorded to degradation of Mst: Lila Rani HPST GGPS Fazal Haq Malwana No.2 from B-15 to B-12 on her own request with immediate effect. Her pay is also protected under the existing rules.

Necessary entry to this effect shown be made in her service book.

DISTRICT EDUCATION OFFICER
FEMALE BANNU.

Endst: No. 4495-97 Dated Bannu the 02/12 / 2014

Copy for information to :

1. The D.A.O Bannu
2. The SDEO Female Pry;Bannu W/Ref to her letter no 3604 dated 13/10/2014
3. The teacher concerned

[Signature]
DISTRICT EDUCATION OFFICER
FEMALE BANNU.

HK Ushar
for n/s
8/12

ATTESTED

[Signature]

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR

OFFICE ORDER.

F. (22)

Mst. Lala Rani PST GGPS Fazal Haq Malwana No.2 Bannu is hereby transferred/ adjusted against vacant post of PST at GGPS Kund Kher, Abab Nowshera on her own pay & BPS in the interest of public service with immediate effect

Note:-

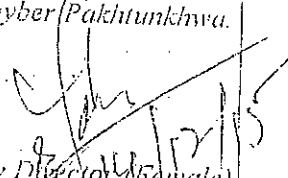
1. Charge report should be submitted to all concerned.
2. No TA/DA etc are allowed.
3. The DEOs (F) concerned are directed to check her original service documents before making payment of her salary.
4. Her seniority will be determined at the bottom of the seniority list of PST(B-12) as per rules

Director
Elementary & Secondary
Education Khyber Pakhtunkhwa

Endst: No. 2051-56 /F.No.83/(F)/G. Transfer dated Peshawar the 15 /12 /2015

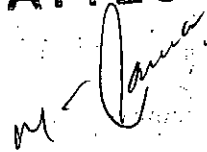
Copy for information to the:-

1. District Education Officer (Female) Bannu & Nowshera
2. District Account Office Bannu & Nowshera
3. Headmistress concerned.
4. Teacher concerned.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa.
6. M/File.


Deputy Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa.

14/12/15

ATTESTED



M. Zahir

To,

The Secretary,
(E&SE) Department,
Khyber Pakhtunkhwa, Peshawar

G-23

Subject: **DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 02.12.2014 WHEREBY THE APPLICANT WAS DEMOTED FROM THE POST OF PSHT (BPS-15) TO THE POST OF PST (BPS-12) WITHOUT ANY LAWFUL JUSTIFICATION**

Respected Sir,

With due respect it begs to submit as under:-

- 1- That the applicant was initially appointed as PST (BPS-07 now BPS-12) before your good self Department vide Notification dated 02.04.1996. That right from the date of her first appointment the applicant has served the Department quite efficiently and upto the entire satisfaction of her superiors.
- 2- That during service the applicant was promoted to the next higher scale and lastly promoted to the post of PSHT (BPS-15) vide order dated 25.02.2013. That in compliance of the order dated 25.02.2013 the applicant submitted her charge report and started performing her duty at concerned station with devotion and honesty.
- 3- That in the year 2005 the applicant submitted a request alongwith service certificate of her husband before the authorities for inter provincial transfer which was accepted and the applicant was transferred to Punjab Province on deputation for the period of three years vide order dated 10.06.2006.
- 4- That the applicant has served for three years in Education Department of Punjab and on completion of her deputation period for three years she turned down to her parent Department in Khyber Pakhtunkhwa and join her duty in District Bannu.
- 5- That it is pertinent to mention here that the applicant was serving at GGPS Fazal Haq Malwana No.2, District Bannu while husband of the applicant was serving in Training Regiment Artillery Centre Attock and permanently residing in Attock alongwith other family members.
- 6- That in the above mentioned reason the applicant requested to her permanent transfer from District Bannu to District Nowshera but the District Education Officer, District Bannu on the basis of malafide intention demoted the applicant from the post of PSHT (BPS-15) to the post of PST (BPS-12) vide order dated 02.12.2014 without any lawful justification.

RECEIVED

or Bannu

1

- 24
- 7- That later on the applicant was transferred from GGPS Fazal Haq Malwana No.2, Bannu to GGPS Kund Kher Abad, District Nowshera on her own request by the Worthy Director E&SE Department, Khyber Pakhtunkhwa, Peshawar against the post of PST (BPS-12) instead of PSHT (BPS-15).
- 8- That applicant time and again requested the DEO (Female), district Bannu to restore original post /basic pay scale i.e. PSHT (BPS-15) and issue transfer order in the same scale for her adjustment in her original basic pay scale in District Nowshera but of no avail.
- 9- That applicant feeling aggrieved from the impugned order dated 02.12.2014 preferred the instant Departmental appeal before your good self on the following grounds.

GROUND:

- A- That the impugned order dated 02.12.2014 is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That the applicant has not been treated by the concerned authority in accordance with law and rules on the subject noted above and as such the concerned authority violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the concerned authority i.e. DEO (Female), Bannu acted in arbitrary and malafide manner while issuing the impugned order dated 02.12.2014 which is not tenable in the eye of law and liable to be set aside.
- D- That the impugned order dated 02.12.2014 has been issued by the DEO (F), Bannu in violation of the principle of natural justice.
- E- That the impugned order dated 02.12.2014 has been issued in violation of Article-38(e) of the Constitution of Islamic Republic of Pakistan, 1973.
- F- That the applicant has been discriminated by the concerned authority by issuing the impugned order dated 02.12.2014.
- G- That no prior notice has been issued to the applicant before issuing the impugned order dated 02.12.2014.
- H- That the impugned order dated 02.12.2014 has been issued by the DEO (F), Bannu without any lawful justification, therefore, the same is not tenable and liable to be set aside.

ATTESTED

M. Bannu

25

It is therefore, most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 02.12.2014 may very kindly be set aside and the concerned authority be directed to restore the applicant on her original post /basic pay scale i.e. PSHT (BPS-15) w.e.f. the date when she was demoted to the post of PST (BPS-12) i.e. 02.12.2014 with all back benefits. That the Director E&SE Department please be directed to issue transfer order in her original basic pay scale as PSHT (BPS-15) for her adjustment against the same PSHT post in District Nowshera. Any other relief which deems fit that may also be awarded in favor of the applicant.

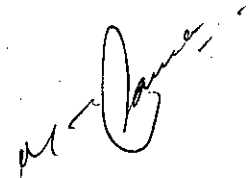
Dated: 22.03.2021.

SINCERELY YOUR'S



MST: LILA RANI, PST
GGPS Kund, Kher Abad, Nowshera

ATTESTED





H-26

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SO(PSIT & SED)/5-1/Gen-Misc/Muhammad Ajmal/2020
Dated Peshawar the 07-04-2021

To

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa,

Subject: -

**DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED
02-12-2014 WHEREBY THE APPLICANT WAS DEMOTED FROM THE
POST OF PSIT (BPS-12) WITHOUT ANY LAWFUL JUSTIFICATION.**

Dear Sir,

I am directed to refer to the subject cited above, and to state that to enclose herewith copy of self-explanatory application/appeal Diary No. 3796 dated 26-03-2021 along-with its enclosures received from Mst. Lila Rani, PST GGPS Kund, Kher Abad, Nowshera, for further necessary action, please.

Yours faithfully,

SECTION OFFICER (PRIMARY)

Encl: as above.

Endst: of even number & date:
Copy to the:-

- 1 PS to Secretary, E&SE Department Khyber Pakhtunkhwa.
- 2 Mst Lila Rani, PST GGPS Kund, Kher Abad, Nowshera.

SECTION OFFICER (PRIMARY)

RECEIVED

VAKALATNAMA

Before the Cyber Punishment Service Tribunal
_____ OF 2021 Peshawar.

Lila Rani

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Lila Rani

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ____/____/2021

[Signature]
CLIENT

[Signature]
ACCEPTED
MIR ZAMAN SAFI
ADVOCATE

OFFICE:

Room No.6-E, 5th Floor,
Rahim Medical Centre, G.T Road,
Hashtnagri, Peshawar.
Mobile No.0323-9295295