

17.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 22.03.2022 for the same as before.

  
Reader.

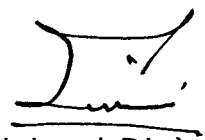
22.03.2022

Miss. Uzma Syed, Advocate, as proxy for learned counsel for the appellant present. Mr. Jehanzeb, Superintendent alongwith Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Miss. Uzma Syed stated that she has been informed by learned counsel for the appellant that he would <sup>be</sup> unable to appear before the bench today, due to some domestic engagements, therefore, adjournment may be granted. Adjourned. To come up for arguments before the D.B on 01.06.2022.



(Rozina Rehman)  
Member (J)



(Salah-ud-Din)  
Member (J)

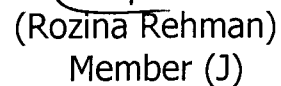
01.06.2022

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Request for adjournment was made on behalf of learned counsel for the appellant being not prepared. Adjourned. To come up for arguments on 11.08.2022 before D.B.

  
(Fareeha Paul)  
Member(E)

  
(Rozina Rehman)  
Member (J)

11.8.2022

Proper DB not available the case is adjourned to 3.11.2022

  
Reader

06.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 13.07.2021 for the same as before.

  
READER

13.07.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG alongwith Jehanzaib, Superintendent for the respondents present.

Respondents have furnished reply/comments. The appeal is entrusted to D.B for arguments on 01.12.2021.

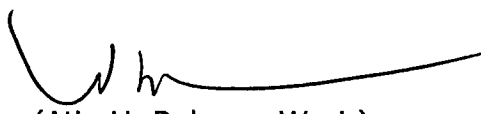
  
Chairman


01.12.2021

Counsel for the appellant present.

Mr. Muhammad Rasheed, Deputy District Attorney alongwith Mr. Jehanzeb Superintendent for respondents present.

Former made a request for adjournment; granted with direction to provide a Member copy of the brief. To come up for arguments on 17.03.2022 before D.B.

  
(Atiq Ur Rehman Wazir)  
Member (E)

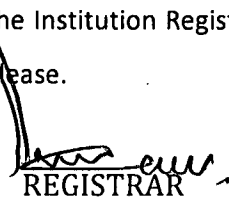

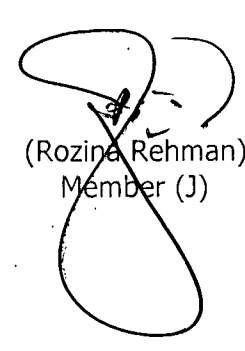
  
(Rozina Rehman)  
Member (J)

Form- A

FORM OF ORDER SHEET

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

Case No.- 15291 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/12/2020	<p>The appeal of Mst. Naheed Tabasum presented today by Syed Noman Ali Bukhari Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>18/01/2021</u></p> <p> CHAIRMAN</p>
	18.01.2021	<p>Appellant present through counsel. Preliminary arguments heard. File perused.</p> <p>Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for written reply/comments. To come up for written reply/comments on 06.04.2021 before S.B.</p> <p> (Rozina Rehman) Member (J)</p>

Appellant Deposited Security & Process Fee  
18/1/21

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

**APPEAL NO: \_\_\_\_\_/2020**

Naheed Tabasum

VS

Govt of KP

**INDEX**

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1.	Memo of appeal	----	01-05
	Condonation of delay application	----	5A-6
2.	Copy of promotion order	---A---	07
3.	Copy of seniority list 2010	---B---	08-11
4.	Copy of promotion order	---C---	12-13
5.	Copy of seniority list BPS-17	---D---	14-20
6.	Copy of objection/application	---E---	21
7.	Copy of final seniority list of BS-17	---F---	22-26
8.	Copy of final seniority list of BS-18	---G---	27-29
9.	Copy of appeal/application	---H---	30
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*Naheed*  
Appellant

Naheed Tabasum

THROUGH:

*Faris*

(FARIS NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT

Room No. Fr-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar Cantt:  
Contact No. 0306.5109438

①

**BEFORE THE KP SERVICE TRIBUNAL PESHAWAR**

APPEAL NO: 5291/2020

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 15787

Dated 01/12/2020

Naheed Tabasum Librarian (BPS-18)  
Government City Girls College Peshawar.

.....APPELLANT

Versus

1. The Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. The Secretary To Government of KP Higher Education Archives & Libraries Deptt Peshawar, Civil Secretariat Peshawar.
3. The Secretary To Government of KP Higher Education Deptt Peshawar, Civil Secretariat Peshawar.
4. The Director Libraries Directorate of Higher Education KP, Peshawar.

.....RESPONDENT

APPEAL UNDER SECTION-4 OF THE KP SERVICE TRIBUNAL ACT 1974, FOR DIRECTING THE RESPONDENTS TO CONSIDER THE APPELLANT FOR REGULAR PROMOTION TO THE POST OF BPS-18 FROM THE DATE APPELLANT WAS PROMOTED ON ACTING CHARGE I.E 11.08.2011 AND AGAINST NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.

**PRAYER:**

THAT ON ACCEPTANCE OF THIS APPEAL THE RESPONDENT MAY BE DIRECTED TO CONSIDER THE APPELLANT FOR REGULAR PROMOTION TO THE POST OF BPS-18 FROM THE DATE APPELLANT WAS PROMOTED ON ACTING CHARGE I.E 11.08.2011, WITH ALL BACK AND CONSEQUENTIOAL BENEFITS AND FURTHER MAY BE DIRECTED TO INCLUDE APPELLANT

*Filed to-day*  
*Registrar*  
*01/12/2020*

(2)

IN THE SENIORITY LIST OF BPS-18 LIBRARIAN AT PROPER PLACE. ANY OTHER REMEDY, WHICH THE HONOURABLE TRIBUNAL THINKS DEMM FITAND APPROPRIATE, MAY ALSO BE AWARDED IN FAVOR OF THE APPELLANT.

RESPECTFULLY SHEWETH

FACTS

The breif acts of the case are as under

1. That the appellant was appointed as Librarian on 13.01.1985 and then promoted to BPS-17 vide notification dated 22.10.2007. the appellant work with full zeal and zest with entire satisfaction of her superiors. **Copy of promotion order to BPS-17 is attached as annexure-A.**
2. That the seniority list of Librarian Bps-17 notified on 29.07.2010 wherein appellant shown at S.No.2. The two vacancy of BPS-18 Senior Librarian was vacant. So therefore, PSB meeting conducted for promotion of librarian BPS-17 to BPS-18 and appellant was consider by the PSB being senior most and promoted from BPS-17 to BPS-18 on acting charge basis against the existing vacancy and kept appellant on probation for period of one year vide notification dated 11.08.2011. **Copy of seniority list and promotion order to BPS-18 is attached as annexure-B & C.**
3. That the appellant name was not included in the seniority of BPS-18 from 2011 to 2018 despite that the appellant was promoted in BPS18 and also working in BPS-18 until date. The appellant name was not included in the librarian seniority of BPS-17 from 2011 to 2018, due to her promotion in BPS-18. In 2018 tentative seniority list of BPS-18 has been issued, the name of the appellant was not included in the same and the name of the junior to the appellant was included. But quite astonishingly when appellant requested and submitted objection/application to the competent authority that appellant was promoted to BPS-18 but till date the appellant was not included in the Seniority of Librarian BPS-18. The appellant was included in the final seniority list notified in 2018 of BPS-17 instead of BPS-18 and junior to the appellant was included in the final seniority list notified in 2018 of BPS-18. The appellant file objection against the same but no fruitful result has been achieved till date. **Copy of the seniority list , application, Final seniority list of BPS-17, final seniority list of BPS-18 and objection/application are attached as annexure- D, E, F, G & H.**
4. That thereafter, the reservation has been made on the promotion of the junior to the appellant vide letter dated 17.05.2019 and vide letter

dated 10.02.2020 the working for the regularization of promotion of librarian to BPS-18 was returned. Thereafter on 21.02.2020 corrigendum has been issued wherein the corrigendum dated 17.05.2019 has been withdrawn whereby the status of the librarian junior to the appellant in BPS-18 has been confirmed. **Copy of letter dated 10.02.2020 and corrigendum dated 21.02.2020 is attached as I & J.**

- 5. That when all the efforts of the appellant went in vain. The appellant filed departmental appeal for the purpose of regularization to the post of BPS-18 from the due date and for inclusion of her name in the seniority list of BPS-18 at proper place which was not responded. The appellant also filed reminder on 05.11.2020 in which appellant clearly written that the appellant is at verge of retirement but despite that no response has been received from the deptt:. Hence the appellant constrained to file this present appeal on following grounds amongst others. **Copy of the Departmental appeal and reminder is attached as annexure-K.**

**GROUND**

- A. That the respondents act and proceedings regarding the service of the appellant is illegal , malafide ,discriminating and not base on equality.
- B. That the appellant has not been treated in accordance with law and his rights secured and guaranteed under the law has also been badly violated.
- C. That the appellant is also entitled to be included in seniority list of BPS-18 being regularly performing duties in BPS-18 and getting pay of BPS-18 and if the regularization order was not issued, it was the fault of department to delay the same for which appellant cannot be held responsible.
- D. That the junior to the appellant was promoted to BPS-18 in 2015 and the appellant is not considered in the same notification, which means that the appellant is already in the BPS-18. The junior to the appellant was included in the seniority list of BPS-18 but appellant was not included in the same which is not warrant by the law which need to be rectify by this tribunal.
- E. That the respondents did not regularized the appellant in BPS-18 and not included in seniority list of BPS-18 and caused service career loss, willfully to appellant which is against the law in vogue.

- u
- F. That the appellant was promoted in 2011 after which appellant was excluded from the list of BPS-17 which is evident of that the appellant was promoted to BPS-18 but despite that after passing 9 years the status of the appellant has not been confirmed. The junior to the appellant was confirmed in BPS-18 but appellant was ignored till date. Which is against the Article 2A, 4 and 25 of the constitution.
- G. That inaction and omission of respondent department, not to regularized the appellant for in BPS-18 is against the spirit of section-9 of Civil Servants Act, 1973, promotion Policy 2009 and service rights duly protected under the Civil Servants laws .
- H. That the apex Court has already clearly held in case of Anita Turab (PLD-2013 Supreme Court Page No. 195) that matter of tenure, appointment, posting, transfer and promotion, of service could not be dealt with in an arbitrary manner but could only be sustained if it was in accordance with law. Whenever there was statutory provision or rules or regulation of government the matter of appointment of Civil Servants that must be followed honestly and scrupulously and discretionary must be exercised and structured, transparent and reasonable manner, thus the verdict of the Honorable Supreme Court fully favours the appellant's case.
- I. That according to the rule of probation if the probation period is not cancelled after one year the probation period is extended to 2<sup>nd</sup> year and on the completion of the 2<sup>nd</sup> year the probation period is automatically terminated. This means that the appellant needs to be treated as regular in BPS-18 after termination of probation period. Because when the appellant is promoted to BPS-18 on acting charge the appellant is only 4/5 month short from qualified service for promotion to BPS-18 therefore, the appellant is promoted on acting charge. The attitude of the deptt towards the appellant is like step Mother. Which is against the law.
- J. That the appellant has 9/10 years of service in BPS-18 but still not got regular status despite the availability of vacancy in budget book due to illegal and malafide act of the department and the junior to the appellant was regular in BPS-18 from 2015 which is discriminatory attitude towards the appellant.
- K. That as there is no any order regarding the stoppage of promotion of appellant, therefore, the appellant has legal vested rights to be considered for promotion from the date when post is available for him in his quota. (97-SCMR-1997-515).



L. That according to Superior Court Judgment reported as 1997 SCMR 515 in which it is held that delay in seeking promotion had entirely due to reason that officer of that department not carry out fairly simple exercise with reasonable period so the appellant is entitled to the promotion from back date

M. That the Honorable Apex Court is also given the verdict that every civil servants is the legal right to be dealt with in accordance with the law and rules under the which is legal service rights are protected. Thus the appellant has legal and genuine claim.

N. That it is, well settled principle of justice that no one should be suffered from the arbitrary acts of public functionaries and the public functionaries are required to act in accordance with rules and law with fair means. But in case of appellant such principle has been violated.

O. That the Supreme Court held in many cases that though the Civil Servant could not claim promotion as matter of right but it was incumbent upon the department/Authority. That when they grant promotion, then in that case the promotion should be granted from the due date of Civil Servant / Availability of post. Thus the appellant is entitled to promotion from due date.

P. That by no sketch of imagination, the appellant can be deprived from the valuable rights in the light of dictums of the supreme courts as well as high court.

Q. That the appellant Seeks permission to advance other grounds at the time of arguments.

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

*Tabasum*  
Appellant

Tabasum

THROUGH

*Noman Ali Bukhari*  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT,

SA

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. \_\_\_\_\_/2020

Naheed Tabasum

VS


Govt of KP

.....  
APPLICATION FOR CONDONATION  
OF DELAY IN THE INSTANT APPEAL


RESPECTFULLY SHEWETH:

1. That the instant appeal is pending before this Honorable Tribunal in which no date has been fixed.
2. That the appellant appeal is for promotion which is recurring cause of action according to superior court judgment 2002 PLC Cs 1388 so there is no limitation run against the same, so the limitation may be condoned.
3. That the department made appellant victim of haraathy.
4. That the august Supreme Court of Pakistan has held that decision on merit should be encouraged rather than knocking-out the litigants on technicalities including limitation. Therefore, appeal needs to be decided on merit (2003, PLD (SC) 724).
5. That, the appeal of the appellant on merit is good enough to be decided on merits.


It is therefore most humbly prayed that the instant appeal may be decided on merit by condoning the delay to meet the ends of justice.

  
APPPELLANT  
Naheed Tabasum

THROUGH

  
SYED NOMAN ALI BUKHARI  
Advocate, High Court  
Peshawar

It is affirmed and declared that the contents application are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'able tribunal.

  
DEPONENT

GOVERNMENT OF NWFP  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT

Dated Peshawar 22 -10- 2007.

NOTIFICATION

NO.SO (T) HE/17-13/2005 The Competent Authority in consultation with Departmental Promotion Committee is pleased to order the promotion of the following Librarians (B-16/ personal grade-17) to BPS-17 (Regular) with immediate effect. These incumbents will continue to work against the posts occupied by them in their respective Colleges.

S.No	Name & Designation	Place of posting
1.	Mst.Khalida Parveen, Librarian	Government Frontier College (Women) Peshawar.
2.	Mst.Irshad Begum, Librarian	Government Girls Post Graduate College Abbotabad.
3.	Mst.Naheed Tabasum, Librarian	Government City Girls College Peshawar.
4.	Mst.Amtul Zuhra, Librarian	Government Girls College saida Sharif Swat.
5.	Mst Naheed Shaheen , Librarian	Government Girls College Manshra
6.	Mst. Atika Saddiqi, Librarian	Government Girls College Nowshera

SECRETARY TO GOVT:OF NWFP  
HIGHER EDUCATION DEPARTMENT

Endst: No.SO(T)HE/17-13/2005

Dated Pesh:the 22.10.2007

Copy forwarded for information and necessary action to:-

1. The Accountant General NWFP Peshawar.
2. The Secretary to Govt: of NWFP Finance Department Peshawar.
3. The Secretary to Govt: of NWFP Establishment Department Peshawar.
4. The Director Higher Education NWFP Peshawar.
5. District Accounts Officer concerned.
6. Principal Govt: Girls College concerned.
7. PS to Chief Secretary NWFP Peshawar.
8. PS to Secretary Higher Education Department NWFP Peshawar.
9. PA to Additional Secretary Higher Education NWFP Peshawar.
10. Officers concerned.

  
SECTION OFFICER (TRG :)

ATTACHED



B1 (2)

2

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT**

Dated Peshawar, the 29<sup>th</sup> July 2010

**NOTIFICATION**

**No. SO(Trg)/HE/17-13/2002-07.-** In exercise of powers conferred under sub-section (1) of section-8 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 read with Rule-4 (1) (b), and Rule-17 of the Khyber Pakhtunkhwa Civil Servants (A, P & T) Rules 1980, the Competent Authority is pleased to approve the following seniority list of 30-Female Librarians (BPS-17) of College Cadre under Higher Education Department as it stood on 30/04/2010:-

**FINAL SENIORITY LIST OF FEMALE LIBRARIANS (BPS-17) (COLLEGE CADRE) CORRECTED UPTO 30.04.2010.**

S.No.	Name of Officer	Education/Qualification	Date of Birth & Domicile	Date of 1st Entry into Govt Service on Regular Basic Scale	Regular Appointment / Promotion to the present post.			Present Appointment with Date / Promotion to Present Post.	
					Date	BPS	Method of recruitment / appointment	BPS	Remarks
1	Mst. Irshad Begum, Librarian, GGC, Abbottabad	M.Li.Sc.	12.8.1956 Abbottabad	24.3.1982	24.3.1982	16	Public Service Commission	17	Regular Promotion vide Notification No. SO(T)HE/17-13/205, dated 22.10.2007.
2	Mst. Naheed Tabasum Librarian, GCGC, Peshawar	B.Li.Sc.	15.4.1962 Peshawar	13.1.1985	13.1.1985	16	-do-	17	"
3	Mst. Amlul-Zuhra, Librarian, GGC Sadu Sharif Swat	M.Li.Sc.	01.12.1961 Malakand Agency	20.5.1987	23.01.1988	16	-do-	17	"
4	Mst. Naheeda Shaheen, Librarian, GEDC, Mansehra	-do-	03.06.1962 Mansehra	07.12.1988	07.12.1988	16	-do-	17	"
5	Mst. Ansa Siddique Librarian GGC Nowshera.	-do-	07.04.1966 Nowshera	29.01.1989	29.01.1989	16	-do-	17	"

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Mst Naz Parver,  
Librarian, GGC, Mardan

Mst. Ishrat Jabeen,  
Librarian, GGC, Thana,  
Multon Mardan.

Mst. Mahnoor,  
Librarian, GGC, Pirpai  
Nowshera.

Mst. Shandana Mirza,  
Librarian, GFCW Peshawar.

Mst. Safina Bibi,  
Librarian, GGC Kohat

Mst. Shaheen Akhtar  
Librarian, GGC Havelian

Mst. Rashida Begum,  
Librarian, GGC Takhi, Bhai  
Mardan

Mst. Saima Norveen,  
Librarian, GGC Hangu

Asma Basher,  
Librarian, GGC Charsadda.

Mst Farhat Jabeen,  
Librarian, GGC Dargai

Mst. Zakia Begum,  
Librarian, GGC Hayatabad  
Peshawar

Mst. Kalsoom Manan,  
Librarian, GGC No 2 D J Khan

Mst. Saima Gul,  
Librarian, GGC Lundkhar  
Mardan

-do-	02.02.1962 Mardan	28.8.1990	28.8.1990	16	-do-	17
-do-	01.03.1966 Malakand Agency.	11.10.1995	11.10.1995	16	-do-	17
-do-	15.09.1975 Mardan	18.8.1999	18.8.1999	16	-do-	17
-do-	2.1.1982	7.1.2004	7.1.2004	16	-do-	17
-do-	27.7.1980 Peshawar	5.1.2004	5.1.2004	16	-do-	17
B.Li.Sc.	1.4.1975 Lakki	12.01.2004	12.01.2004	16	-do-	17
-do-	16.3.1974 Abbottabad	19.1.2004	19.1.2004	16	-do-	17
-do-	12.3.1981 Mardan	1.1.2005	1.1.2005	16	-do-	17
-do-	16.7.1979 Kohat	22.12.2004	22.4.2004	16	-do-	17
-do-	1.2.1982 Charsadda	20.12.2004	20.12.2004	16	-do-	17
-do-	1.9.1982 Malakand Agency.	20.12.2004	20.12.2004	16	-do-	17
-do-	08.01.1974 Peshawar	22.11.1994	1.4.2006	16	-do-	17
-do-	4.12.1978 Lakki	17.4.2006	17.4.2006	16	-do-	17
-do-	5.3.1980 Mardan	6.4.2006	6.4.2006	16	-do-	17

Upgraded  
promoted vide vide  
Notification  
No.SO(M)HE/17-  
1/2008-Vol.III, dated  
01.01.2010.

*[Handwritten signature]*

20	Mst. Nida Azilz, Librarian, GGC Nowshera	-do-	24.3.1982 Nowshera	6.4.2006	6.4.2006	16	-do-	17
21	Mst. Sadia Miraj Noor, Librarian, GGC Bannu	-do-	21.3.1978 Mohmand Agency.	31.3.2006	31.3.2006	16	-do-	17
22	Mst. Gul Babi, Librarian, GGC Nowansher Abbottabad	-do-	1.1.1980 Abbottabad	13.6.2005	25.4.2006	16	-do-	17
23	Mst. Humera begum, Librarian, GGC Totakan	-do-	18.7.1983 Malakand Agency.	17.3.2006	17.3.2006	16	-do-	17
24	Mst. Naseem Ara, Librarian, GGC Timergara Dir.	-do-	27.12.1980 Dir	19.7.2006	19.7.2006	16	-do-	17
25	Mst. Bushera Khatoon, Librarian, GGC NO.2 Abbottabad	-do-	1.5.1975 Haripur	2.7.1993	11.10.2006	16	-do-	17
26	Mst. Nusrat Begum, Librarian, GGC Iakki	-do-	8.8.1979 Lakki	4.12.2007	4.12.2007	16	-do-	17
27	Mst. Sabarina Nasir, Librarian, GGC Karnal Sher khan Swabi	-do-	25.2.1983 Mardan	26.11.2007	26.11.2007	16	-do-	17
28	Mst. Hafiza Jalwa Bashir, Librarian, GGC Gulshan Rehman Colony Peshawar.	-do-	8.3.1985 Charsadda	1.11.2007	1.11.2007	16	-do-	17
29	Mst. Shehla Bashir, Librarian, GGC Jamrud Khyber Agency.	-do-	21.9.1983 Mohmand Agency.	20.11.2007	20.11.2007	16	-do-	17
30	Mst. Shaista Malak, Librarian, GGC No.2 Mansehra	-do-	4.6.1984 Mansehra.	27.10.2007	27.10.2007	16	-do-	17

10

Upgradation  
Promotion vide  
notification  
NO.SO(A&L)HE/  
17-1/10/Vol-IV  
dated 14.4.2010.

Upgradation  
Promotion vide  
No. No.  
SO(T)HE/17-1-  
2006 Vol.III,  
dated 1.1.2010.

9/16/14

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA.  
HIGHER EDUCATION DEPARTMENT PESHAWAR.

Dated Peshawar the 29<sup>th</sup> August 2010.

(11)

of the above is forwarded for information & necessary action to :-

- 1. The Accountant General, Khyber Pakhtunkhwa, Peshawar.
- ✓ 2. The Director Higher Education, Khyber Pakhtunkhwa, Peshawar. He is requested to circulate it among all concerned.
- 3. The Director of Education (FATA) Khyber Pakhtunkhwa, Peshawar with the request to circulate it among all concerned.
- 4. P.S to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
- 5. P.A to Secretary Higher Education, Khyber Pakhtunkhwa, Peshawar.

↓  
 7618  
 ADG Lib  
 27/8/10  
 18/5/10  
 (Signature)  
 3556  
 19/8/2010

(Signature)

SECTION OFFICER (LIB & ARCH.)  
 GOVT. OF KHYBER PAKHTUNKHWA,  
 HIGHER EDUCATION, DEPARTMENT.

RECEIVED





GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT

Dated Peshawar the, August 11, 2011

**NOTIFICATION**

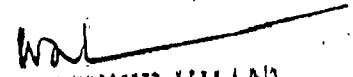
No. SO(A&L)HE/17-13(B)/2011 On the recommendation of the Provincial Selection Board, the Competent Authority is pleased to order the promotion of Mst. Naheed Tabbasum, Librarian, Govt. City Girls College, Peshawar from BPS-17 to BPS-18 of college cadre on acting charge basis against the existing vacancy with immediate effect. The Officer will be on probation for a period of one year.

Secretary to Govt. of Khyber Pakhtunkhwa  
Higher Education Archives & Libraries Deptt:

**Endst. No. & date even.**

Copy forwarded for information and necessary to:

1. Accountant General, Khyber Pakhtunkhwa Peshawar
2. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar w/r to his letter No. 19924 dated 17-6-2011.
3. P.S to Chief Minister, Khyber Pakhtunkhwa.
4. P.S to Chief Secretary, Khyber Pakhtunkhwa.
5. P.S to Secretary Establishment Department, Peshawar.
6. P.S to Secretary Finance Department, Peshawar.
7. P.S to Minister, Higher Education, Khyber Pakhtunkhwa, Peshawar.
8. Principal, Govt. City Girls College, Peshawar.
9. Deputy Director (IT), Planning Cell, Higher Education Department.
10. PS to Secretary, Higher Education Department, Peshawar
11. Mst. Naheed Tabbasum, Librarian, Govt. City Girls College, Peshawar

  
(WAHEED KHAN)  
Section Officer (A&L)

ATTACHED

(22)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT

No. SO(A&L)HE/17-13(B)/2011  
Dated Peshawar the, October 17, 2011

To  
The Secretary to Govt. of Khyber Pakhtunkhwa,  
Finance Department, Peshawar.

SUBJECT: PROMOTION OF LIBRARIAN FROM BPS-17 TO BPS-18.

Dear Sir,

I am directed to refer to your letter No. SO(FR)/FD/7-11/2009 dated 27-9-2011 on the subject noted above and to state that Finance Department had forwarded an approved summary vide letter No. FD(SOSR.II)10-7/03/Vol:III dated 06-10-2007 (copy enclosed) for necessary action. In pursuance of the said a notification on 21-1-2008 was issued (copy enclosed) which indicates endorsement of Finance Department vide No. FD(SOSR.II) 10-7/2007 dated 21-1-2008. The same notification was superseded vide notification No. SO(T)HE/17-1/2008/Vol:III dated 9-9-2009 (Copy enclosed) placing 07 posts of librarian in BS-18, the same was also endorsed by the Finance Department.

It is worth mentioning that these 07 posts were further distributed amongst the male/female librarians in accordance with their sanctioned strength in BS-17 and 05 male librarians were promoted to BS-18 (Copy of notification attached). Two posts falling to the share of female librarians were placed before the PSB and according to recommendations of PSB Mst. Naeed Tabassum was promoted to Senior Scale of Librarian (BPS-18) copy enclosed. In the circumstances, it is evident that the officer was promoted against an upgraded post and her colleagues already benefiting of the same. It might be omission somewhere in the Budget Book as pointed out by Accountant General Khyber Pakhtunkhwa.

You are requested to facilitate the officer's promotion by doing the needful at your end and inform the Accountant General accordingly.

Encl: As above.

Yours faithfully,

WAHEED KHAN  
Section Officer (Arch: & Lib)

Copy to:

1. Accountant General, Khyber Pakhtunkhwa for information w/r to their letter No. H-24/Promotion/Fixation/2011-12/1070 dated 12-9-2011.
2. P.S to Secretary, Higher Education Department.

Section Officer (Arch: & Lib)

(BETTER COPY NO. D-14)

NAME OF DEPARTMENT

HIGHER EDUCATION

TENTATIVE SENIORITY LIST OF BPS-17) FEMALE LIBRARIANS AS STOOD ON 30-11-2011

No. 30736-85: The competent authority is pleased to approved the Provisional Seniority List of the Female Librarian (BPS-17) of College Cadre as Stood on 30-11-2011.

No	Name of Officer with Academic	Education Qualification	Date of Birth & Domicile	Date of 1 <sup>st</sup> entry in to Govt. service	Regular Appointment / In To The Present Cadre Service			Date of Promotion Up-gradation in to the present scale	
					Date	BPS	Method of Recruitment / Appointment	BPS	Remarks
1.	Mst. Amtal Zuhra Librarian, GGC Sadu Sharif, Swat	MLI Sc	01-12-1961, Mkd: Age	20-05-1987	23-01-1988	16	Regularized from Adhoc Service	17	Promoted into BS17 @25%. Formula vide Notification No. SO(T) He/17-13/2005 dated: 22-10-2007.
2.	Mst. Naheeda Shaheen, Librarian, GGDC, Mansehra	---do---	03-06-1962 Mansehra	07-12-1988	07-12-1988	16	---do---	17	---do---
3.	Mst. Naz Perver Lib, GGC, Mardan	---do---	02-02-1962 Mardan	28-08-1990	28-08-1990	16	Public Service Commission	17	Up gradation / promotion vides notification No. SO(T)HE/17-1/2008/VolIII, dated: 01-01-2020
4.	Mst. Ishrat Jabeen Lib, GGC, Thana	---do---	01-03-1966 Mkd: Ag	11-10-1995	11-10-1995	16	---do---	17	---do---
5.	Mst. Rifat naz, Lib, GGC Sheikh maltoon, mardan	---do---	15-09-1975 Mardan	18-08-1999	18-08-1999	16	---do---	17	---do---
6.	Mst. Mahnoor Lib, GGC, Pripai, Nowshera	---do---	02-01-1982 Nowshera	07-01-2004	07-01-2004	16	---do---	17	---do---
7.	Nst. Shandana Mirza Lib, GFCW, Peshawar	---do---	27-07-1980 Peshawar	05-01-2004	05-01-2004	16	---do---	17	---do---
8.	Mst. Safina Bibi Lib GGC, Kohat	---do---	01-04-1975 Lakki	12-01-2004	12-01-2004	16	---do---	17	---do---
9.	Mst. Shaheen Akhtar, Lib, GGC, Havalian	---do---	16-03-1974 Abbottabad	19-01-2004	19-01-2004	16	---do---	17	---do---

TENTATIVE SENIORITY LIST OF BPS-17 FEMALE LIBRARIANS IN SCHOOL / COLLEGE

No: 20736-85 : The Competent Authority is pleased to approve the Provisional seniority list of the Female Librarian (B-17) of College cadre as stood on 30/11/2011.

Sl. No	Name of Officer with Academic	Education Qualification	Date of Birth & Domicile	Date of Entry in to Govt. Service.	Regular Appointment /in to the present cadre /Service			Date of Promotion / Up gradation in to the present scale	
					Date	BPS	Method of Recruitment/ Appointment	BPS	Remarks
1	Mst. Anam Zafra Librarian, GGC Sadu Sharif Swat	MLI Sc	01.12/1961 Mild. Ag	30.05.1987	23.01.1988	16	Regularized from Adhoc Service	17	Promoted into B-17 vide BPS Formula Vale Notification No. 300(1) HE/17-1/2005 dated 2/10/2007
2	Mst. Nahceda Shaheen Librarian GDC, Manshera	--do--	03.06.1962 Manshera	07.12.1988	07.12.1988	16	--do--	17	do
3	Mst. Naz Parver Lib GGC Mardan	--do--	02.02.1962 Mardan	28.08.1990	28.08.1990	16	Public Service Commission	17	Up gradation promotion vide Notification No. SOFT. HE/17-1/2008 Vol III Dated 01-01-2010
4	Mst. Ishrat Jabeen Lib. GGC Triana	--do--	01.03.1966 Mild. Ag	11.10.1995	1.10.1995	16	--do--	17	do
5	Mst. Rifai Naz Lib: GGC Sheika Malkoon Mardan	--do--	15.09.1975 Mardan	18.8.1999	18.8.1999	16	--do--	17	do
6	Mst. Mahnoor Lib: GGC Pirpai Nowshera	--do--	2.1.1982 Nowshera	7.1.2004	7.1.2004	16	--do--	17	do
7	Mst. Shardana Mirza lib: GFCW Peshawar	--do--	27.7.1980 Peshawar	5.1.2004	5.1.2004	16	--do--	17	do
8	Mst. Safina Bibi lib: GGC Kohat	--do--	1.4.1975 Fakir	12.01.2004	2.01.2004	16	--do--	17	do
9	Mst. Shaheen Akhtar lib: GGC Havelian	--do--	16.3.1974 Abbottabad	19.1.2004	19.1.2004	16	--do--	17	do

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. \_\_\_\_\_/2022

Mr. Shareef Ullah Khan S/o Saeed khan, Ex- Junior Clerk  
R/o Medad kheil, tehsil Saraye Norung, District Lakki Marwat.

(Appellant)

**VERSUS**

1. The Director Education, Elementary & Secondary Education  
Peshawar.
2. The District Education Officer (Male) lakki Marwat.

(Respondents)

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**APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACTS, 1974, AGAINST THE VERBAL WITHDRAWAL ORDER OF APPOINTMENT AND ILLEGAL STOPPAGE OF SALARY, AND AGAINST NOT DECIDING DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.**

**PRAYER:**

**THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDER OF WITHDRAWAL OF APPOINTMENT NEVER COMMUNICATED TO APPELLANT MAY PLEASE BE SEASIDE AND THE APPELLANT MAY BE REINSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. AND STOPPED SALARY OF THE APPELLANT MAY BE RELEASED. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT**

produce the attested/ Photostat copies of the documents/proof where they desire any correction. In case of no appeal with in stipulated period, this list will be considered as final.

4. Officers Concerned.

*Assistant Director (Libraries)*  
*Directorate of Higher Education*  
*Khyber Pakhtunkhwa Peshawar*

O/L

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~~SECRET~~

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**RESPECTFULLY SUBMITTED:**

2

**FACTS:**

1. That the appellant was appointed as Junior Clerk against the vacant post vide order dated 20.04.2017 on proper recommendation of departmental selection committee under deceased son Quota and posted at GHS Amir Muhammad wali. The appellant properly submitted his charge report/Arrival report and medical fitness certificate. **(Copy of appointment order and medical certificate is attached as Annexure-A)**
2. That the appellant has performed his duties assigned to him with zeal and devotion and there was no complaint, what so ever regarding his performance. **Copy of attendance register is attached as annexure-B.**
3. That the appellant performing his duties till September 2020 and suddenly the salary of the appellant has been stopped, when the appellant inquire about the stoppage of salary the clerk verbally told him the inquiry was constituted against the appellant regards the withdrawal of appointment order but neither the inquiry nor the withdrawal order of appointment order was communicated to the appellant, which is against the law, against which appellant filed departmental appeal which was not responded within statutory period of 90 days . **(copy departmental appeal is attached as Annexure-C.)**
4. Hence the appellant constrained to file the instant service appeal on the following grounds amongst others.

**GROUND:**

- A. That the verbal withdrawal order and stoppage of salary are against the law, facts, norms of justice, and material on record, therefore not tenable and liable to be set aside.
- B. That the whole proceeding conducted by the respondent department is against the law and rules.
- C. That the appellant has been condemned unheard and has not been treated according to law and rules.



1.

NAME OF DEPARTMENT

HIGHER EDUCATION DEPARTMENT

10

**TENTATIVE SENIORITY LIST OF (BPS-17) FEMALE LIBRARIANS AS STOOD ON 22-01-2018.**

No: The Competent authority is pleased to approve the Provisional seniority list of Female Librarians (BPS-17) of College cadre as stood on 22/01/2018.

S #	Name of Officer	Educational Qualification	Date of Birth	Date of 1 <sup>st</sup> entry in to Govt: Service	Appointment in to the service/ Cadre		Promotion / Up. Gradation to the Present Post		Mode of Appointment	Remarks
					Date	Date	BPS			
1	Mst. Hafiza Jalwa Bashir Lib: GGC Pabbi Nowshera	MLISc.	08/03/1985 Charsadda	01/11/2007	01/11/2007	01/01/2010	BPS-17	By Promotion	Upgradation/promotion vide Notification No. SO(T)HE/7-1/2008 Dated 01/01/2010	
2	Mst. Shehla Bashir Lib: GGC Jamrud Khyber Agency	-- do--	21/09/1983 Mohmand Agency	20/11/2007	20/11/2007	01/01/2010	BPS-17	-- do--	--do--	
3	Mst Shaista Malik Lib: GGC No.2 Mansehra	-- do--	04/06/1984 Mansehra	27/10/2007	27/10/2007	01/01/2010	BPS-17	--do--	--do--	
4	Mst. Tahira Begum Lib: GG Bacha Khan College Peshawar	-- do--	01/03/1979 Peshawar	24/09/2009	24/09/2009	01/01/2010	BPS-17	--do--	--do--	
5	Mst. Shahnaz Begum Lib: GGC Ghazi	-- do--	04/09/1980 Takht Bhai	24/09/2009	24/09/2009	01/01/2010	BPS-17	--do--	--do--	
6	Mst. Nosheen Lib: GGC Julagram	-- do--	01/05/1983 Charsadda	24/09/2009	24/09/2009	01/01/2010	BPS-17	--do--	--do--	

Librarian

Intd / Page # 157  
20/02/18 / Diary # 2370

To: Mr. Lal Sher

FATA DIRECTORATE



	Lib: GGC Marghuz Swabi		22/04/1980 Charsadda	01/02/2011	01/02/2011	01/01/2010	BPS-17	By Initial recruitment through PSC Directly in BPS-17 vide Noification - No. SO(A&L) HE/17-2/2010 dated 01/02/2011	Seniority position has been recorded according to the Merit Order of PSC
8	Mst. Saima Ali Lib: GGC Gulshan Rehman Peshawar	--do--	11/04/1987 Peshawar	01/02/2011	01/02/2011	01/02/2011	BPS-17	--do--	--do--
9	Mst. Samina Rustam Lib: GGC	--do--	23/03/1988 Attack punjab	01/02/2011	01/02/2011	01/02/2011	BPS-17	--do--	--do--
10	Mst. Tawheeda Bibi Lib: GGC Katlang	--do--	10/04/1981 Mardan	03/02/2011	03/02/2011	01/02/2011	BPS-17	--do--	--do--
11	Mst. Asma Naz Lib: GGC Panjpir Swabi	--do--	18/03/1978 Swabi	01/02/2011	01/02/2011	01/02/2011	BPS-17	--do--	--do--
12	Mst. Sana Ali Lib: GGC Charsadda	--do--	20/12/1987 Charsadda	03/02/2011	03/02/2011	01/02/2011	BPS-17	--do--	--do--
13	Mst. Rehana Rahim Lib: GGC	--do--	19/12/1983 Mardan	01/03/2011	01/03/2011	01/02/2011	BPS-17	--do--	--do--
14	Mst. Farkhanda Lib: GGC	--do--	30/03/1984 Mardan	18/02/2011	18/02/2011	01/02/2011	BPS-17	--do--	--do--
15	Mst. Mehreen Gul Lib: GGC	--do--	01/01/1986 Nowshera	12/02/2011	12/02/2011	01/02/2011	BPS-17	--do--	--do--
16	Mst. Shagufta Bibi Lib: GGC	--do--	01/05/1987 Lakki Marwat	01/02/2011	01/02/2011	01/02/2011	BPS-17	--do--	--do--
17	Mst. Salma Usman GFCW Peshawar	--do--	22/03/1983 Peshawar	02/02/2011	02/02/2011	01/02/2011	BPS-17	--do--	--do--

17

LIBRARY

Librarian

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18	Mst. Fatima Zuhra Lib: GGC	--do--	08/12/1980 Karak	14/02/2011	14/02/2011	01/02/2011	BPS-17	--do--	--do--
19	Mst. Asma Ibrar Lib: GGC	--do--	05/05/1985 Malakand	02/02/2011	02/02/2011	01/02/2011	BPS-17	--do--	--do--
20	Mst. Sumbal Sajjad Lib: GGC Mathra Peshawar	--do--	09/04/1985 Peshawar	02/02/2011	02/02/2011	01/02/2011	BPS-17	--do--	--do--
21	Mst. Sughra Lib: GGC Para Chinar	--do--	07/07/1986 Kurram Agency	01/02/2011	01/02/2011	01/02/2011	BPS-17	--do--	--do--
22	Mst. Munazza Ibrahim Lib: GGC Manki Swabi	--do--	13/12/1987 Peshawar	01/02/2011	01/02/2011	01/02/2011	BPS-17	--do--	--do--
23	Mst. Sumaira Gul Lib: GGC KDA Kohat	--do--	06/06/1983 Kohat	01/02/2011	01/02/2011	01/02/2011	BPS-17	--do--	--do--
24	Mst. Hussan Bahar Lib: GGC Karak	--do--	07/04/1983 Karak	02/03/2011	02/03/2011	01/02/2011	BPS-17	--do--	--do--
25	Mst. Sumaira Masood Lib: GGC No.1 Abbotabad	--do--	07/11/1986 Abbotabad	01/02/2011	01/02/2011	01/02/2011	BPS-17	--do--	--do--
26	Mst. Ishrat Jabeen Lib: GGC No.2 Charsadda	--do--	04/11/1975 Charsadda	10/05/2011	10/05/2011	01/02/2011	BPS-17	--do--	--do--
27	Mst. Sharafat Jamala Lib: GGC Alizai Kurram Agency	--do--	05/03/1983 Kurram Agency	01/02/2011	01/02/2011	01/02/2011	BPS-17	--do--	--do--

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~~MISSING~~

Librarian

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40	Mst. Fozia Wazir Lib: GC	--do--	04/11/1986 Haripur	14/02/2014	14/02/2014	14/02/2014	BPS-17	--do--	--do--
41	Mst. Beenish Tanveer Lib: AD (A&L)	--do--	24/05/1987 Peshawar	22/02/216	22/02/216	22/02/216	BPS-17	By Initial recruitment through PSC Directly in BPS-17	Seniority position has been recorded according to the Merit Order of PSC Dated :
42	Mst. Tasleem aziz Lib: GGC Jandol	--do--	08/02/1986 Chitral	17/02/2016	17/02/2016	17/02/2016	BPS-17	--do--	--do--
43	Mst. Nabila Shafaq Lib: GGC Nelor Saidan	--do--	01/09/1993 Peshawar	23/02/2016	23/02/2016	23/02/2016	BPS-17	--do--	--do--
44	Mst. Amina Malik Lib: GDC Sarai Saleh	--do--	12/09/1982 Haripur	01/03/2016	01/03/2016	01/03/2016	BPS-17	--do--	--do--
45	Mst. Amna Rahim Lib: GGDC Sarai Nurang	--do--	22/04/1990 Lakki Marwat	29/02/2016	29/02/2016	29/02/2016	BPS-17	--do--	--do--
46	Mst. Mamoonah Khan Lib: GGDC Thall	--do--	06/02/1991 Bannu	24/02/216	24/02/216	24/02/216	BPS-17	--do--	--do--
47	Mst. Robina Musarrat Lib: GGDC No.1 Di Khan	--do--	05/04/1987 Lakki Marwat	17/02/2016	17/02/2016	17/02/2016	BPS-17	--do--	--do--
48	Mst. Saira Lib: GGDC Shahbqadar	--do--	31/12/1986 Charsadda	24/02/216	24/02/216	24/02/216	BPS-17	--do--	--do--
49	Mst. Bibi Nooh Lib: GPGC Saidu Sharif	--do--	25/12/1986 Chitral	02/03/2016	02/03/2016	02/03/2016	BPS-17	--do--	--do--
50	Mst. Faiza Shahms Lib	--do--	25/12/1984 Mansehra	30/11/2017	30/11/2017	30/11/2017	BPS-17	--do--	--do--
51	Mst. Seema Khan Lib	--do--					BPS-17	--do--	--do--
52	Mst. Sara Azmat Lib F	--do--					BPS-17	--do--	--do--
53	Mst. Bibi Sobia	--do--	05/04/1990 Mansehra	18/04/2017	18/04/2017	18/04/2017	BPS-17	--do--	--do--

ATTACHED  
 (M)

Librarian

**DIRECTOR OF HIGHER EDUCATION  
KHYBER PAKHTUNKHWA**

20

Endst: No.

5295-318

16/11/18

Copy of the above is forwarded for information and necessary action to the:-

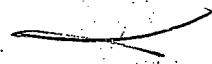
1. Director of Education (FATA) Khyber Pakhtunkhwa.
2. Section Officer (C-IV) Govt. of Khyber Pakhtunkhwa Higher Education Deptt.
3. All Principals of Govt. Colleges (Female) with the request to bring in the notice of Librarian concerned that the tentative seniority list from S.No.1 to 53 has been made according to the merit orders of the Public Service Commission / Joining their service and they may be asked to check their particulars etc and submit their appeals/objections/representation if any within one month of the issue of this list to Director Higher Education Khyber Pakhtunkhwa, Peshawar. They will produce the attested/Photostat copies of the documents/proof where they desire any correction. In case of no appeal within stipulated period. This list will be considered as final.
4. Officer concerned.



(Ihasn Ullah Khan)

**ASSISTANT DIRECTOR LIBRARIES  
DIRECTORATE OF HIGHER EDUCATION**

Librarian



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To  
The Honorable Secretary,  
Higher Education,  
Govt of Khyber Pakhtunkhwa,  
Peshawar.

Through Proper Channel.

Subject: APPROVAL FOR REGULARIZATION / INCLUSION IN THE SENIORITY LIST OF FEMALE LIBRARIANS BPS (18).

Respected Sir,

It is kindly stated that I was promoted to BPS (18) on Acting charge basis with effect from 11/08/2011 vide notification No. SO(A&L)HE/17-13(B)/2011 and was on probation for a period of one year.

Respected sir, due to non regularization of my promotion to BPS(18) acting charge basis my name has not been included in the seniority list of female librarians BPS(18) issued by Higher Education Department Govt of Khy Pakhtunkhwa, Peshawar.

Sir, it is now humbly requested that my promotion to BPS(18) on acting charge basis may please be regularized with retrospective date i.e. 11-08-2012 so that I may be placed in the seniority list of female librarians BPS(18) accordingly.

Thanking you.

Sincerely Yours

*Naheed*  
Naheed Tabassum  
Librarian

Govt City Girls College Peshawar.

03005837009

*IT responsibility*

*9/0  
Kamran Bangash  
I.T (Minister)*

*Please get a report with in a 03 days and see as to how the interest of the lady be protected*

*is accordance with Rules.*  
*SS*  
*29/11/2019*

ATTACHED

Librarian

GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT

F 22

Dated Peshawar the September 5, 2018.



**NOTIFICATION**

**NO. SO(C-IV)/HE/17-1/Seniority/Lib.** In Exercise of Power conferred under sub-section (1) of Section -8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with 4(b)a of Khyber Pakhtunkhwa Civil Servants APT, Rules 1989, Establishment Department letter No.SOR-1(E&AD) 3-15/88 (Vol-I) dated 09-05-2012, the Competent Authority is pleased to approve the Seniority List of the Female Librarian (BPS-17) of Directorate of Higher Education Department, Khyber Pakhtunkhwa as it stood on 20-07-2018 is as under:-

S#	Name of Officer	Qualification	Date of Birth with Domicile	Date of 1 <sup>st</sup> Entry into Government Service.	Date of 1 <sup>st</sup> appointment in the office	Date of Regular appointment/promotion to the present post		Method of Appointment to the present position	Remarks
						Date	BPS		
1	Mst. Naheed Tabasum Lib: City Girls College Peshawar	BLISc.	15-04-1962 Peshawar	13-04-1985	11-08-1985	22-10-2007	BPS-17	By Promotion	Regular Promotion vide notification No.SO(T) HE/17-13/2005 Dated 22-1-2007
2	Mst. Hafiza Jalwa Bashir Lib: GGC Pabbi Nowshera	MLISc.	08/03/1985 Charsadda	01/11/2007	01/11/2007	01/01/2010	BPS-17	By Promotion	Upgradation/promotion vide Notification No. SO(T)HE/7-1/2008 Dated 01/01/2010.
3	Mst Shaista Malik Lib: GGC No.2 Mansehra	-- do --	04/06/1984 Mansehra	27/10/2007	27/10/2007	01/01/2010	-- do --	-- do --	-- do --
4	Mst. Tahira Begum Lib: GG Bacha Khan College Peshawar	-- do --	01/03/1979 Peshawar	24/09/2009	24/09/2009	01/01/2010	-- do --	-- do --	-- do --

Librarian

6

	2	3	4	5	6	7	8	9	10
5.	Mst. Shahnaz Begum Lib: GGC Ghazi	--do--	04/09/1980 Takht Bhai	24/09/2009	24/09/2009	01/01/2010	--do--	--do--	--do--
6.	Mst. Nosheen Lib: GGC Julagram	--do--	01/05/1983 Charsadda	24/09/2009	24/09/2009	01/01/2010	--do--	--do--	--do--
7.	Mst. Saima Begum Lib: GGC Marghuz Swabi	MLISC	22/04/1986 Charsadda	01/02/2011	01/02/2011	01/02/2011	BPS-17	By Initial recruitment through PSC Directly in BPS-17	Seniority position has been recorded according to the Order of PSC
8.	Mst. Saima Ali Lib: GGC Gulshan Rehman Peshawar	--do--	11/04/1987 Peshawar	01/02/2011	01/02/2011	01/02/2011	--do--	--do--	--do--
9.	Mst. Samina Rustam Lib: GGC Tarkha Nowshera	--do--	23/03/1986 Peshawar	01/02/2011	01/02/2011	01/02/2011	--do--	--do--	--do--
10.	Mst. Tawheed Bibi Lib: GGC Katlang	--do--	10/04/1987 Mardan	03/02/2011	03/02/2011	01/02/2011	--do--	--do--	--do--
11.	Mst. Asma Naz Lib: GGC Malik Pura Abbotabad	--do--	18/03/1978 Swabi	29/12/2008	01/02/2011	01/02/2011	--do--	--do--	--do--
12.	Mst. Sara Ali Lib: GGC Charsadda	--do--	30/12/1987 Charsadda	03/02/2011	03/02/2011	01/02/2011	--do--	--do--	--do--
13.	Mst. Rehana Rahim Lib: GGC Mandian Abbotabad	--do--	19/12/1983 Mardan	01/03/2011	01/03/2011	01/02/2011	--do--	--do--	--do--
14.	Mst. Farkhanda Lib: GGC Rustam	--do--	30/03/1984 Mardan	18/02/2011	18/02/2011	01/02/2011	--do--	--do--	--do--
15.	Mst. Mehreen Gul Lib: GHGC Nowshera	--do--	01/01/1986 Nowshera	12/02/2011	12/02/2011	01/02/2011	--do--	--do--	--do--
16.	Mst. Shagufta Bibi Lib: GGC Hayatabad	--do--	01/05/1987 Lakki Marwat	01/02/2011	01/02/2011	01/02/2011	--do--	--do--	--do--
17.	Mst. Salma Usman GFCW Peshawar	--do--	22/03/1988 Peshawar	02/02/2011	02/02/2011	01/02/2011	BPS-17	--do--	--do--
18.	Mst. Fatima Zuhra Lib: GGC Bannu	--do--	08/12/1980 Karak	14/02/2011	14/02/2011	01/02/2011	--do--	--do--	--do--
19.	Mst. Asma Ibrar Lib: GGC Garikapura	--do--	03/05/1985 Malakand	02/02/2011	02/02/2011	01/02/2011	--do--	--do--	--do--
20.	Mst. Sumbal Sajjad Lib: GGC Mathra Peshawar	--do--	09/04/1985 Peshawar	02/02/2011	02/02/2011	01/02/2011	--do--	--do--	--do--

97

RECEIVED

Librarian

Section Officer (B.I.)  
Govt. Of Khyber Pakhtunkhwa  
Peshawar

13

	2	3	4	5	6	7	8	9	10
21.	Mst. Sughra Lib: GGC Para Chinar	--do--	07/07/1986 Kurram Agency	01/02/2011	01/02/2011	01/02/2011	--do--	--do--	--do--
22.	Mst. Munazza Ibrahim Lib: GGC Manki Swabi	--do--	13/12/1987 Peshawar	01/02/2011	01/02/2011	01/02/2011	--do--	--do--	--do--
23.	Mst. Sumaira Gul Lib: GGC KDA Kohat	--do--	06/06/1983 Kohat	07/06/2011	07/06/2011	01/02/2011	--do--	--do--	--do--
24.	Mst. Hussah Bahar Lib: GGC Karak	--do--	07/04/1983 Karak	02/03/2011	02/03/2011	01/02/2011	--do--	--do--	--do--
25.	Mst. Sumaira Masood Lib: GGC No.1 Abbotabad	--do--	07/11/1986 Abbotabad	01/02/2011	01/02/2011	01/02/2011	--do--	--do--	--do--
26.	Mst. Ishrat Jabeen Lib: GGC No.2 Charsadda	--do--	04/11/1975 Charsadda	10/05/2011	10/05/2011	01/02/2011	--do--	--do--	--do--
27.	Mst. Sharafat Jamala Lib: GGC Alizai Kurram Agency	--do--	05/03/1983 Kurram Agency	01/02/2011	01/02/2011	01/02/2011	--do--	--do--	--do--
28.	Mst. Shahida Ghafoor Lib: GGC Chitral	--do--	08/06/1983 Chitral	27/10/2010	27/10/2010	10/04/2012	BPS-17	By Promotion	Vide Notification No SO(C-IV)HE /17-2/2012 dated 10/04/2012
29.	Mst. Afnan Sharif Lib: GGC Manari Swabi	--do--	07/04/1983 Mardan	28/10/2010	28/10/2010	10/04/2012	--do--	--do--	--do--
30.	Mst. Zainab Bibi Lib: GGC Jandool Dir	--do--	18/09/1985 Chitral	29/10/2010	29/10/2010	10/04/2012	--do--	--do--	--do--
31.	Mst. Ayesha Nisar Lib: GGC Chaghar Matti, Peshawar	--do--	15/07/1987 Malakand Agency	25/09/2012	25/09/2012	19/09/2012	--do--	By Initial recruitment through PSC Directly in BPS-17	Seniority position has been recorded according to the M. Order of PSC
32.	Mst. Seema Gul Lib: GC Lund Khwar	--do--	06/03/1986 Mkd. Agency	13/12/2012	13/12/2012	13/09/2012	--do--	--do--	--do--
33.	Noreen Huma Librarian GC Alizai	--do--	15/08/1988 Kurram Agency	07/12/2012	07/12/2012	07/12/2012	--do--	--do--	--do--
34.	Mst. Amina Afridi Lib: GGC Jamrud Khyber Agency	--do--	20/01/1984 Khyber Agency	29/08/2012	29/08/2012	27/08/2012	--do--	--do--	--do--
35.	Mst. Abida Hussain Lib: GC Parachinar	--do--	16/04/1987 Kurram Agency	06/10/2012	06/10/2012	13/09/2012	--do--	--do--	--do--

21

APPROVED

Librarian

Signature of the Librarian  
Date: 13/12/2012

10



	2	3	4	5	6	7	8	9	10
36.	Mst. Safia Lib: GC Khwaza Khela	--do--	26/03/1986 Swat	19/09/2012	19/09/2012	13/09/2012	--do--	--do--	--do--
37.	Mst. Shakila Kausar Lib: GC Boni Chitral	--do--	20/08/1988 Chitral	13/09/2012	13/09/2012	13/09/2012	--do--	--do--	--do--
38.	Mst. Lubna Mehboob Lib: GC KTS Haripur	--do--	31/01/1987 Haripur	13/09/2012	13/09/2012	13/09/2012	--do--	--do--	--do--
39.	Mst. Fatima Taurat Lib: GC Yaka Gund	--do--	01/04/1984 Mohmand Agency	25/05/2013	25/05/2013	13/09/2012	--do--	--do--	--do--
40.	Mst. Fozia Wazir Lib: GC	--do--	04/11/1986 Haripur	14/02/2014	14/02/2014	06/02/2012	BPS-17	--do--	--do--
41.	Mst. Beenish Tanveer Lib: AD (A & L Deptt.)	--do--	24/05/1987 Peshawar	22/02/2016	22/02/2016	16/02/2016	BPS-17	--do--	--do--
42.	Mst. Tasleem aziz Lib: GGC Booni	--do--	08/02/1986 Chitral	17/02/2016	17/02/2016	16/02/2016	BPS-17	--do--	--do--
43.	Mst. Nabila Shafaq Lib: GGC Nelor Saidan	--do--	01/09/1993 Peshawar	23/02/2016	23/02/2016	16/02/2016	BPS-17	--do--	--do--
44.	Mst. Amjina Malik Lib: GDC Sarai Saleh	--do--	12/09/1982 Haripur	01/03/2016	01/03/2016	16/02/2016	BPS-17	--do--	--do--
45.	Mst. Amna Rahim Lib: GGDC Lachi	--do--	22/04/1990 Lakki Marwat	29/02/2016	29/02/2016	16/02/2016	BPS-17	--do--	--do--
46.	Mst. Mamqona Khan Lib: GGDC Thall	--do--	05/02/1991 Bannu	24/02/2016	24/02/2016	16/02/2016	BPS-17	--do--	--do--
47.	Mst. Robina Musarrat Lib: GGDC No.1 DI Khan	--do--	05/04/1987 Lakki Marwat	17/02/2016	17/02/2016	16/02/2016	BPS-17	--do--	--do--
48.	Mst. Saira Lib: GGDC Shahbgadar	--do--	31/12/1986 Charsadda	24/02/2016	24/02/2016	16/02/2016	BPS-17	--do--	--do--
49.	Mst. Bibi Nooh Lib: GPGC Saidu Sharif	--do--	25/12/1986 Chitral	02/03/2016	02/03/2016	16/02/2016	BPS-17	--do--	--do--
50.	Mst. Faiza Shahms Lib: Ghazi Haripur	--do--	25/12/1984 Mansehra	30/11/2017	30/11/2017	19/07/2016	BPS-17	--do--	--do--
51.	Mst. Seema Khan Lib GGDC Dara Adam Khel	--do--	21/12/1986 Mohmand Agency	04/05/2016	03/05/2016	03/05/2016	BPS-17	--do--	--do--

25

LIBRARY

Librarian

Same  
Date  
Lib.

17

	2	3	4	5	6	7	8	9	10
52.	Mst. Sara Azmat Lib GGDC Wanna	--do--	28/02/1990 South Waziristan	05/05/2016	03/05/2016	03/05/2016	BPS-17	--do--	--do--
53.	Mst. Bibi Sobia, GGDC Qalandar Abad, Abbottabad	--do--	05/04/1990 Mansehra	18/04/2017	18/04/2017	05/04/2017	BPS-17	--do--	--do--

26

SECRETARY TO GOVT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT

Endst; No.& Date as above.

Copy forwarded to the:

1. Director Higher Education Department, Khyber Pakhtunkhwa with the request to circulate amongst all the concerned.
2. Deputy Director (HEMIS) Cell Higher Education Department with the request to upload the same on the official website of the department.
3. PS to Secretary, Higher Education Department
4. Master File

(MAHSAL KHAN)  
SECTION OFFICER (C-IV)

Section Officer (C-IV)  
Govt. of Khyber Pakhtunkhwa  
Higher Education Department,  
Archives & Records Management

Librarian

18



GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT

Received

10/12/18

27

Muhammad Wajid Khan  
Assistant Director Librarians

Dated Peshawar the November 30, 2018.

NOTIFICATION

NO. SO(C-IV)/HE/17-1/Seniority/Lib. In Exercise of Power conferred under sub-section (1) of Section -8 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 read with 4(b) of Khyber Pakhtunkhwa Civil Servants APF, Rules 1989, Establishment Department letter No.SOR-1(E&AD) 3-15/88 (Vol-I) dated 09-05-2012, the Competent Authority is pleased to approve the Seniority List of the Female Librarian (BPS-18) of Directorate of Higher Education Department, Khyber Pakhtunkhwa as it stood on 10-09-2018 is as under:-

S. #	Name of officer	Educational Qualification	Date of Birth	Date of 1st entry into Govt. Service	Appointment into the service/Cadre	Promotion/ Up Gradation to Present Post		Mode of Appointment	Remarks
						Date	BPS		
1	2	3	4	5	6	7	8	9	10
1.	Mst. Amtul Zara, Lib: GGC Saidu Sharif Swat	MLISc.	01/12/1961 Malakand Agency	20/05/1987	23/01/1988	22/10/2015	BPS-18	By Promotion	By Promotion vide notification No.SO (C-IV) HE/17-30/2012 dated 22/10/2015.
2.	Mst Naheeda Shaheen, Lib: GGDC, Mansehra	-- do--	03/06/1962 Mansehra	07/12/1988	07/12/1988	22/10/2015	BPS-18	-- do--	-- do--
3.	Mst Naz Parver, Lib: GGC Mardan	-- do--	02/02/1962 Mardan	28/08/1990	28/08/1990	22/10/2015	BPS-18	-- do--	-- do--
4.	Mst Rifat Naz, Lib: GGC Sheikh Maltoon Mardan	-- do--	15/09/1975 Mardan	18/08/1999	18/08/1999	22/10/2015	BPS-18	-- do--	-- do--

ATTACHED

Librarian

o/c

Secretary (Librarians)  
Govt. of Khyber Pakhtunkhwa  
Higher Education Department  
Peshawar

17-12-18

MA

1	2	3	4	5	6	7	8	9	10
5.	Mst. Mahnoor, Lib: GGC Pirpai Nowshera	--do--	02/01/1982 Nowshera	07/01/2004	07/01/2004	22/10/2015	BPS-18	--do--	--do--
6.	Mst. Shandana Mirza, Lib: GFCW Peshawar	--do--	27/07/1980 Peshawar	05/01/2004	05/01/2004	22/10/2015	BPS-18	--do--	--do--
7.	Mst. Safina Bibi, Lib: GGC Hangu	--do--	01/04/1975 Lakki Marwat	12/01/20004	12/01/2004	22/10/2015	BPS-18	--do--	--do--
8.	Mst. Shahéen Akhtar, Lib: GGC Havalian	--do--	16/03/1974 Abbotabad	19/01/2004	19/01/2004	22/10/2015	BPS-18	--do--	--do--
9.	Mst. Rashida Begum, Lib: GGC Takht Bhai Mardan	--do--	12/03/1981 Mardan	01/01/2005	01/01/2005	22/10/2015	BPS-18	--do--	--do--
10.	Mst. Saima Noreen, Lib: GGC Kohat	--do--	16/07/1979 Kohat	22/12/2004	22/12/2004	22/10/2015	BPS-18	--do--	--do--
11.	Mst. Asma Basher, Lib: GGC Umerzai Charsadda	--do--	01/02/1982 Charsadda	20/12/2004	20/12/2004	22/10/2015	BPS-18	--do--	--do--
12.	Mst. Farhat Jabeen, Lib: GGC Dargai	--do--	01/09/1982 Mkd: Agency	20/12/2004	20/12/2004	22/10/2015	BPS-18	--do--	--do--
13.	Mst. Zakia Begum, Lib: GGC Zaryab Colony	--do--	08/01/1974 Peshawar	01/04/2006	01/04/2006	22/10/2015	BPS-18	--do--	--do--
14.	Mst. Kalsoom Manan, Lib: GGC No. 2 DI Khan	--do--	04/12/1978 Lakki Marwat	17/04/2006	17/04/2006	22/10/2015	BPS-18	--do--	--do--
15.	Mst. Saima Gul, Lib: GGC Lund Khwar Mardan	--do--	05/03/1980 Mardan	06/04/2006	06/04/2006	22/10/2015	BPS-18	--do--	--do--

27

RECEIVED  
LIBRARY

Librarian

Section Officer (Library)  
Govt. of Khyber Pakhtunkhwa  
Higher Education,  
Arts & Libraries Department

1	2	3	4	5	6	7	8	9	10
16.	Mst. Nida Aziz, Lib: GGC Nowshera	--do--	24/03/1982 Nowshera	06/04/2006	06/04/2006	22/10/2015	BPS-18	--do--	--do--
17.	Mst. Sadia Meraj Noor, Lib: GGC Panjpir Swabi	--do--	21/03/1978 Mohmand Agency	31/03/2006	31/03/2006	22/10/2015	BPS-18	--do--	--do--
18.	Mst. Gul Bibi, Lib: GGC. Nowansher Abbotabad	--do--	01/01/1980 Abbotabad	13/06/2005	25/04/2006	22/10/2015	BPS-18	--do--	--do--
19.	Mst. Humaira Begum, Lib: GGC Totakan	--do--	18/07/1983 Mkd: Agency	17/03/2006	17/03/2006	22/10/2015	BPS-18	--do--	--do--
20.	Mst. Naseem Ara, Lib: GGC Timergara Dir	--do--	27/12/1980 Dir	19/07/2006	19/07/2006	22/10/2015	BPS-18	--do--	--do--
21.	Mst. Bushra Khatoon, Lib: GGC Mandian Abbotabad	--do--	01/05/1975 Haripur	02/07/1993	20/07/2006	22/10/2015	BPS-18	--do--	--do--
22.	Mst. Nusrat Begum, Lib: GGC Lakki	--do--	08/08/1979 Lakki	04/12/2007	04/12/2007	22/10/2015	BPS-18	--do--	--do--
23.	Mst. Sabrina Nasir, Lib: GGC Karnal Sher Khan Swabi	--do--	25/02/1983 Mardan	26/11/2007	26/11/2007	22/10/2015	BPS-18	--do--	--do--

29

Librarian

*[Handwritten signature]*

SECRETARY  
HIGHER EDUCATION DEPARTMENT

Endst; No. & Date as above.

Copy forwarded to the:

1. Director Higher Education Department, Khyber Pakhtunkhwa with the request to circulate amongst all the concerned.
2. Deputy Director (HEMIS) Cell Higher Education Department with the request to upload the same on the official website of the department.
3. PS to Secretary, Higher Education Department
4. Master File

*[Handwritten signature]*  
(MAHSAL KHAN)  
SECTION OFFICER (C-IV)  
Officer (C-IV)  
Higher Education,  
Khyber Pakhtunkhwa

11: (C)

(BETTER COPY NO. H-30)

To

The Honorable Secretary  
High Education, Achieves and Libraries Department  
Government of Khyber Pakhtunkhwa, Peshawar.

**Subject: APPROVAL FOR REGULARIZATION / INCLUSION IN THE SENIORITY LIT OF FEMAL LIBRARIAN, BPS-18**

Respected Sir,

It is submitted with due regards that I enrooted an appeal through proper channel on 19-02-2018 regarding the matter mentioned in the subject above as my name is missing in the final seniority list of female librarian BPS-18 issued by the competent authority on 20-07-2018 (copy enclosed).

Since, I was promoted to BPS-18 on acting charge basis on 11-02-2011 though BSP with a probation period of one year, therefore I was supposed to be regularized after probation but due to the entire negligence of the quarter concerned, I am yet to be regularized inspite being the senior most female librarian appointee of 1985 batch through public service commission. Ironically, speaking my name was not even included in the seniority list of female librarian BPS-17, which was included only recently after tendering an appeal to this effect by me on 19-02-2018. (Copy attached).

Now, when the tentative seniority list of female librarian BPS-18 issued on 22-01-2018 and after having noticed that my missing in the list, I soon afer floated an appeal to this effect on 19-02-2018 for the inclusion of my name in the seniority list but unfortunately in spite of my appeal well in time, the final seniority list was also issued on 20-07-2018. (copy attached).

Secondaly, my appeal also entails the issue of my delayed regularization to BPS-18 which was due since 2012 as I was promoted to BPS-18 through PSB on acting charge basis vide notification issued on 11-08-2011 (copy enclosed) now when having been rejected my working papwrs by the SO (PSB) submitted fro regularization (Copy attached), I requested you to consider my case of regularization retrospective i.e. August 2012 as two sanctioned posts mentioned in the budget book are still laying vacant, for I am being suffered for the fault none of mine but of the quarter concerned.

Respected sir, I hopy my humble appeal would be considered sympathetically and justice will be made in this respect.

Thanking you,

Dated: 28-12-2018

Sincerely Yours

Mst. Naheed Tabassum  
Librarian

H 20

The Honorable Secretary  
Higher Education, Archives and Libraries Department,  
Government of Khyber Pakhtunkhwa, Peshawar.

**Subject: APPROVAL FOR REGULARIZATION/INCLUSION IN THE SENIORITY  
LIST OF FEMALE LIBRARIANS B.P.S-18**

Respected Sir,

It is submitted with due regards that I submitted an appeal through proper channel on 19-02-2018 regarding the matter mentioned in the subject above as my name is missing in the final tentative list of female Librarian B.P.S-18 issued by the competent authority on 20-07-2018 (copy enclosed).

Since, I was promoted to B.P.S-18 on acting charge basis on 11-02-2011 through P.S.B. with a probation period of one year, therefore I was supposed to be regularized after probation but due to the entire negligence of the quarter concerned, I am yet to be regularized in spite being the senior most female librarian appointee of 1985 batch through public service commission. Ironically speaking, my name was not even included in the seniority list of female Librarians B.P.S-17, which was included only recently ~~by the competent authority~~ after tendering an appeal to this effect by me on 19-02-2018.

Now, when the tentative seniority list of female librarians B.P.S-18 issued on 22-01-2018 and after having noticed that my name missing in the list, I soon after floated an appeal to this effect on 19-02-2018 for the inclusion of my name in the seniority list but unfortunately in spite of my appeal well in time the final seniority list was also issued on 20-07-2018 (copy enclosed).

Secondly, my appeal also entails the issue of my delayed regularization to B.P.S-18 which was due since 2012 as I was promoted to B.P.S-18 through P.S.B. on acting charge basis vide notification issued on 11-08-2011 (copy enclosed). Now when having been rejected my working papers by the S.O (P.S.B.) submitted for regularization (copy attached), I request you to consider my case of regularization retrospectively i.e. August 2012 as two sanctioned posts mentioned in the budget book are still laying vacant, for I am being suffered for the fault none of mine but of the quarter concerned.

Respected sir, I hope my humble appeal would be considered sympathetically and justice will be made in this respect.

Thanking you,

Dated: 28-12-2018

Sincerely yours,

*Mst. Nuheed Tabassum*  
Mst. Nuheed Tabassum,

Librarian,

ATTACHED

Scanned with CamScanner



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT

31

No. SO (PSB) ED/1-4/2018/P-207  
Dated Peshawar, the 10-02-2020

To

The Secretary to  
Government of Khyber Pakhtunkhwa,  
Higher Education Department

SUBJECT: PROMOTION CASE OF LIBRARIANS BS-18 ON ACTING CHARGE BASIS TO THE POST OF LIBRARIAN BS-18 ON REGULAR BASIS OF COLLEGE CADRE HIGHER EDUCATION DEPARTMENT.

Dear Sir,

I am directed to refer to Higher Education Department letter No.SO (C-IV) HED/2-7/Naheed Tabasum/2019 dated 20.09.2019 on the subject and to say that the Higher Education Department vide its notification dated 17.05.2019, has clarified that the up-gradation of the Librarian notified vide notification dated 22.10.2015 as personnel. Therefore, their names would be in the seniority list of BS-17. As such final seniority list of BS-18 is yet to be notified, which has not been done.

2. The working paper and other documents received with the letter quoted above are returned in original.

Yours faithfully,

(Abdul Hameed)  
SECTION OFFICER (PSB)

Enst. of Even No & Date.

A copy is forwarded to Section Officer (R-I) Establishment Department.

SECTION OFFICER (PSB)

AS/COO  
C.T.V  
*[Handwritten signature]*

ATTESTED

ATTESTED





GOVERNMENT OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES AND  
LIBRARIES DEPARTMENT

J (32)

Dated Peshawar the, February 21, 2020.

NOTIFICATION

NO.SO(C-IV) HE/17-30/2012/588. The Competent Authority has been pleased to withdraw the corrigendum No. SO (C-IV) HE/17-30/2012/588 dated 17<sup>th</sup> May, 2019 from the date of its issuance, in the best public interest.

SECRETARY  
HIGHER EDUCATION DEPARTMENT

Endst: no. & date even.

Copy to

1. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department w.r.t Section Officer (FR) letter No. SO(FR)/FD/10-22/2015-16 dated 23.09.2015.
3. Accountant General, Khyber Pakhtunkhwa Peshawar.
4. Director, Higher Education, Khyber Pakhtunkhwa Peshawar.
5. All Principals concerned
6. Deputy Director (HEMIS) Cell Higher Education Department.
7. Budget Officer-X, Finance Department, Khyber Pakhtunkhwa.
8. Section Officer (FR), Finance Department, Khyber Pakhtunkhwa.
9. All District Accounts Officers Concerned.
10. Officers concerned.
11. PS to Secretary Higher Education Department.
12. PS to Special Secretary Higher Education Department.
13. Master File.

Shaula  
SECTION OFFICER (C-IV)

ATTENDED

ATTENDED

To

The Honorable Chief Secretary,  
Government of Khyber Pakhtunkhwa,  
Peshawar.

K (83)

**SUBJECT: APPEAL FOR APPROVAL OF REGULARIZATION TO BPS-18**

Sir,

With due reverence it is stated that I was allowed promotion to BPS-18 on Acting charge basis w.e.f August 11, 2011 vide notification No. SO (AVL) 11E/17- 13(13) 2011 whereby my status was on probation for a period of one year and thereafter the department concerned should have sent my case to P.S.B for regularization but failed to do so even after a lapse of eight (8) long years. It is yet another irony that my junior fellow librarians have been promoted to BPS-18 in spite my appeal to this effect to the secretary of Higher Education Department on February 19,2018.

Sir,

As a last resort, I do hereby submit an appeal at the office of your good self with the hope that my case will be considered sympathetically and that my issue will be routed to the concerned quarters with the instructions for an early resolution.

Thanking you.

Sincerely yours,

Mst Naheed Tabassum



Librarian

Government City Girls College  
Peshawar

Copy Forwarded for information to:

1. Chief Minister Khyber Pukhtunkhwa.
2. Secretary Higher Education Government of Khyber Pukhtunkhwa.

ATTESTED

**UZMA SYED**

Advocate High Court Peshawar.

Cell: (0306-5109438)

No

(34)

D. No: 6443

The Chief Secretary  
Govt. of Khyber Pakhtunkhwa  
Peshawar.

ISSUE BR  
CHIEF SEC  
P

Subject:- REMINDER  
Appeal for Approval of Regularisation to B.

Respected Sir,

It is kindly submitted that I had  
tendered an appeal regarding subject mentioned  
above on 24th Feb 2020 but regrettably no  
progress is made till date. Sir, as I am  
retired within a year therefore my case reg  
in your office on 24-02-2020 with Diary No:  
(w/p) may please be decided as soon as  
possible. Since my regularisation to B.P.S-10 is  
yet to be decided even after a lapse of nine ye

Thanking you.

Dated 05/11/2020.

Sincerely yours  
Mst Naheed Tabassum  
Historian  
Govt. City Girls College  
Peshawar

PS/C.S Khyber Pakhtunkhwa  
Diary No. 6443 w/e  
Date 05-11-2020

ATTEST

UZMA SYED  
Advocate High Court Peshawar.

**VAKALATNAMA**

NO. \_\_\_\_\_/20

IN THE COURT OF K P Sofoza Bilawal, Pesh

Nahed Tabasum

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

H. Edu

(Respondent)  
(Defendant)

I/We, Nahed Tabasum

Do hereby appoint and constitute **SYED NOMAN ALI BUKHARI** Advocate High Court 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 costs.

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. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_/20

Nahed  
(CLIENT)

ACCEPTED

Syed

**SYED NOMAN ALI BUKHARI**  
Advocate High Court Peshawar.

**UZMA SYED**  
Advocate High Court Peshawar.

Cell: (0306-5109438)

**"B"**

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

*S.B*

No.

Appeal No. *15291* of 20*20*

*Nahed Tabasum* Appellant/Petitioner

Versus

*The Court: KPK Chief Secy Peshawar* Respondent

Respondent No. *4*

*Lead*

Notice to:

*The Director of Higher Education  
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 *6/4/2021* 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.

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 *3<sup>rd</sup>*.....

Day of..... *Feb*.....20 *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,  
PESHAWAR.**

*SR*

No.

Appeal No. 15291 of 2020

Nabeed Tabasum Appellant/Petitioner

Versus

The Court KPST Chief Secy Peshawar Respondent

Respondent No. 1

Notice to: —

The Court KPST 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 07/02/2021 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 1 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.

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 3<sup>rd</sup> .....

Day of Feb 2021

*Qul 15/2*

*[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.  
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**"B"**

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

S.B

No.

Appeal No.....15291..... of 20 20

.....Nabazad Tabasum.....Appellant/Petitioner

Versus

.....The Govt. KP Chief Secy Peshawar..... Respondent

Respondent No.....2.....

Notice to: —

The Secretary to Govt. KP  
Higher Education 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.....15/2/21.....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 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.

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.....15/2/21.....

Day of.....Feb 20 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,  
PESHAWAR. S.B

No.

Appeal No. 15291 of 2020

Nahed Tabasum

Appellant/Petitioner

Versus

the Govt. KPK Chief Secy Peshawar

Respondent

Respondent No. 3

Notice to:

the Secretary to Govt. KPK Higher Education 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 6/4/2021 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.

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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 3<sup>th</sup>

Day of Feb 2021

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.