

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1293/2018

Ulfat Begum, District Education Officer (Female), District Charsadda.

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat Khyber Pakhtunkhwa, Peshawar and two others.

O R D E R

08.06.2021


None present for the appellant. Mr. Muhammad Saleem, Section Officer alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

The appeal in hand was called on for hearing after various intervals, however neither the appellant nor anyone else appeared on her behalf, till closing time of the court, therefore, the appeal in hand stands dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

08.06.2021


(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

28.12.2020

Due to summer vacation, case is adjourned to
15.3.2021 for the same as before.



Reader

15.03.2021

Counsel for the appellant and Mr. Muhammad Rashid,
DDA for the respondents present.

Learned DDA requests for adjournment as inadvertently
his office did not handover the brief alongwith the cases fixed
for today.

Adjourned to 08.06.2021 before D.B.

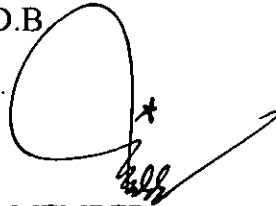

(Mian Muhammad)
Member(E)


Chairman

08.06.2020

Clerk to counsel for the appellant present. Mr. Ziaullah, DDA for respondents present. Due to general strike of the Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for arguments on 17.08.2020

before D.B


MEMBER


MEMBER

17.08.2020

Due to summer vacations, the case is adjourned to 27.10.2020 for the same.


Reader


27.10.2020


Proper D.B is on Tour, therefore, the case is adjourned for the same on 28.12.2020 before D.B.


Reader

12.12.2019

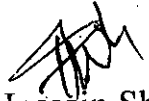
Due to general strike of Khyber Pakhtunkhwa Bar Council learned counsel for the appellant is not available today. Mr. Ziaullah, Deputy District Attorney for the respondents present. Adjourned to 11.02.2020 for arguments before D.B.



(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

11.02.2020

Junior to counsel for the appellant present. Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Junior to counsel for the appellant seeks adjournment as senior counsel for the appellant is not available today. Adjourned. To come up for arguments on 30.03.2020 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

30.03.2020

Due to public holiday on account of COVID-19, the case is adjourned to 08.06.2020 for the same as before.


Reader

08.07.2019


Counsel for the appellant and Addl. AG alongwith Shakeel Superintendent for the respondents present.


Joint parawise comments on behalf of respondents No. 1 to 3 submitted which are placed on record. To come up for arguments on 23.09.2019 before the D.B. The appellant may submit rejoinder, within a fortnight, if so advised.


Chairman

23.09.2019

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council learned counsel for the appellant is not in attendance. Mr. Riaz Khan Paindakhel learned Assistant Advocate General for the respondents present. Adjourned. To come up for further proceedings on 01.11.2019 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

01.11.2019

Clerk of counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy before the Hon'ble Peshawar high Court, Peshawar and cannot attend the Tribunal today. Adjourned to 12.12.2019 for arguments before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

14.03.2019

Clerk to counsel for the appellant present. Written reply not submitted. Mr. Fazal Subhan SO representative of the respondent department absent. He be summoned with the direction to furnish written reply/comments. Granted. To come up for written reply/comments on 17.04.2019 before S.B.



Member

17.04.2019

No one present on behalf of appellant. Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Shakeel Superintendent present. Written reply not submitted. Representative of the respondent department seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 11.06.2019 before S.B.



Member

11.06.2019

Clerk to counsel for the appellant and Addl: AG for respondents present. Written reply/comments not submitted. Notices be issued to the respondents for submission of written reply/comments. Last opportunity granted. Case to come up written reply/comments on 08.07.2019 before S.B.



(Ahmad Hassan)

Member

03.01.2019

Counsel for the appellant Ulfat Begum present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant is serving in Education Department. It was further contended that the appellant joined the Education Department as SST (BPS-16) with effect from 1987. It was further contended that in the year 2011 she passed Public Service Commission exam and was posted as District Education Officer (Female) Charsadda in the management cadre. It was further contended that some colleagues of the appellant namely Rafique Khattak, Hafiz Ibrahim and Gohar Ali were also remained in teaching cadre and after some time they were adjusted in Management Cadre. It was further contended that their seniority was counted by the respondent-department from the date of their appointment but the respondent department reluctant to count the seniority of the appellant from the date of her appointment therefore, the appellant was discriminated. It was further contended that the appellant filed departmental appeal on 03.07.2018 but the same was rejected on 18.09.2018 hence, the present service appeal. Learned counsel for the appellant further contended that the respondent-department was bound to count the services of the appellant from the date of her first appointment.

The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 14.03.2019 before S.B.


(Muhammad Amin Khan Kundi)
Member

Appellant Deposited
Security / Process Fee

BEFORE THE KHYBER PAKHTUNKHWA
SERFVICE TRIBUNAL PESHAWAR

Appeal No. 1293/2018

Ulfat Begum, District Education Officer (female) District
Charsadda.

(Appellants)

VERSUS

Govt of Khyber Pakhtunkhwa through Chief Secretary Civil
Secretariat Khyber road, Peshawar and others.


(Respondents)

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Through


Applicant


Zartaj Anwar

Advocate High Court
Office FR , 3-4 Forth Floor
Bilour Plaza Peshawar Cantt.
Cell: 0331-9399185
Email: Zartaj9@yahoo.com

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 1293/2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1525

Date 11-10-2018

Ulfat Begum, District Education Officer (female) District
Charsadda. (Appellants)

VERSUS

1. Govt of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat Khyber road, Peshawar.
2. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Khyber road, Peshawar
3. Secretary to Government of Khyber Pakhtunkhwa Establishment Department Civil Secretariat Khyber road, Peshawar.

(Respondents)

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, as the services of the similarly placed colleagues were counted from the date of initial appointment in the department and on the basis's of which promoted to higher posts, But refuse the same to the appellant, against which the Appellant filed Departmental Appeal dated 03.07.2018 and was regretted vide letter dated 17.09.2018.

Prayer in Appeal:

Filed to-day

Registrar

11/10/18

On acceptance of this appeal the departmental appeal dated 03.07.2018 may kindly be accepted and the services of the appellant may also be counted for the purpose of promotion and seniority as been counted / allowed to all the similarly placed employees of the same department with all consequential benefits

or

Any other remedy not specifically asked for and deemed proper in the circumstances of the case may also be allowed.

Respectfully Submitted:

- 1) That the appellant initially joined education department as SST BPS-16 in year 1987, While performing duties, served the department for a decade with great zeal and devotion, Became Head Mistress BPS-17 through Public Service Commission in the year 1997.
- 2) That in the year 2011 the management cadre was segregated from the teaching cadre and Management cadre was introduced in education department, appellants while serving as Head Mistress applied in service to the post of District Education Officer BPS-18 through public service commission in management cadre, when found fit and eligible the commission duly recommended her as District Education Officer (F) Charsadda in the year 2011. (Copies of appointments orders are attached as annexure A).
- 3) That the appellant while performing her duties since her appointment in management cadre at various district with zeal and devotion to the entire satisfaction of the superiors without any complaint what so ever.
- 4) That the department has never adopted or observed two different cadre of seniority rather never observed teaching cadre seniority of the appellant, As the seniority of the colleagues of the appellant namely Mr. Rafiq Khattak Ex-Director elementary and secondary education Khyber Pakhtunkhwa (Management Cadre), and very recently vide notification dated 23.05.2018, the provincial selection Board in its meeting held on 15.05.2018 with the approval of the competent authority promote two Officers of management Cadre of elementary and secondary education to BPS-20 on their overall seniority /service basis's. (Copy of the notification dated 23.05.2018 is attached as annexure B)
- 5) That the sonority of the appellant was maintained and circulated since her initial appointment along her colleagues in the same list without any distinguishable cadre or group, but maintained from date of initial appointment in the education department.(copies of the seniority list are attached as annexure C)

- 6) That the appellants was appointed in the same department since her initial appointment and when the management cadre was introduced the appellant along with her colleagues were recommended but never maintained different seniority list, and also senior colleagues of the appellant on the basis of such seniority promoted to BPS-20.
- 7) That unfortunately the respondents throughout adopted the policy of pick and choose while promoting some of the officials while counting all their service in the department and refusing the same to the present appellant, discriminating the appellant and deprived of her right of even handed treatment and refuse the same to the appellant as to adjust their blue eyed ones in preference of the appellant.
- 8) That the appellant filed writ petition no 4265/2018 before Peshawar high court Peshawar, which was disposed off vide order dated 18.09.2018 with direction as the issues relates to the term and condition of service, the service tribunal is the right forum for the issue in hand.(copy of the order and judgment dated 18.09.2018 is attached as annexure D)
- 9) That the appellant time and again submitted her representations / applications against the illegal and unlawful refusal while not counting the pervious service and not promoting her to BPS-20, which has been replied vide office letter dated 17.09.2018 by rejecting the departmental appeal of the appellant. (Copy of representations / applications and office order dated 17.09.2018 are attached as annexure E & F).
- 10) That the order dated 17.09.2018 is against the law and facts and illegal and liable to be set-aside inter alia on the following grounds.

GROUND OF WRIT PETITION:

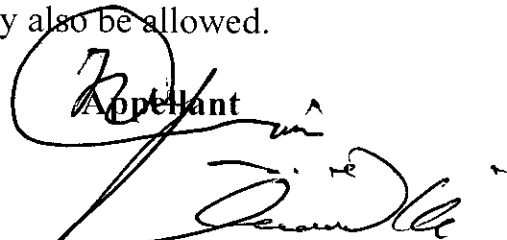
- A. That the Appellant has not been treated in accordance with law, her rights secured and guaranteed under the law and Constitution has been violated.
- B. That the respondents are not acting in accordance with law and not treating the appellant alike.

- C. That the conduct of the respondents is apparently tainted with malice, malafide and bias, similarly favoritism, nepotism & political interference prevailed in the process of promotion, thus the promotion so made is discriminatory.
- D. That the department has never adopted or observed two different cadre of seniority rather never observed teaching cadre seniority of the appellant, As the seniority of the colleagues of the appellant namely Mr. Rafiq Khattak Ex-Director elementary and secondary education Khyber Pakhtunkhwa (Management Cadre), and very recently vide notification dated 23.05.2018, the provincial selection Board in its meeting held on 15..5.2018 with the approval of the competent authority promote two Officers of management Cadre of elementary and secondary education to BPS-20 on their overall seniority /service basis's
- E. That not considering appellant for promotion from his due date and delay/inaction on the part of respondents is against the law, facts, norms of justice, and material on record and also against the principle fair play and equity.
- F. That the appellant has not been treated as per notified gazetted rules by the respondents which deprived the appellant from his due right of promotion since his fulfillment of the required qualifications and experience.
- G. That the state is bound to ensure the elimination of all forms of exploitation and the gradual fulfillment of the fundamental principles. It is also the duties of the state to remove disparity in the income and earning of individuals under Article 37 & 38 of the Constitution.
- H. That the Appellant has at her credit the spot less service career prescribed qualification/experience for the post correctly mentioned besides has a vast experience of handling these posts, is thus eligible and fit to be promoted to BPS-20.
- I. That under Article 25 of the Constitution of the Islamic Republic of Pakistan 1973, all citizen are equal before law, and that no discrimination is permitted in the similarly placed citizens, thus the discrimination meted out to the appellant in the grant of regularization is illegal, highly discriminatory and not sustainable.

- J. That inaction on the part of respondents is adversely affecting the Appellants career; hence the proprietary demands that the Appellants should be allowed to perform their duties and regularization against the posts appellants performing their duties.
- K. That the Appellant while posted in the respondents department performing her duties with honesty great zeal and devotion to the entire satisfaction of the superiors without any complaint what so ever.
- L. That the Superior Courts have repeatedly held that where a point of law is decided by the Superior Courts that cover the cases of all those civil servants who have not litigated than the good governance require that the benefit of such judgment should also be given to those who may not be parties to the litigation instead of compelling them to approach the Service Tribunal or any other forum. Reference can be made to case reported as SCMR 1996Page 1185, 2009 SCMR Page 1, the appellant being similarly placed is also entitled to similar treatment meted out to their counter parts.
- M. That the appellant seeks the permission of this honourable Court to rely on additional grounds at the hearing of this petition.

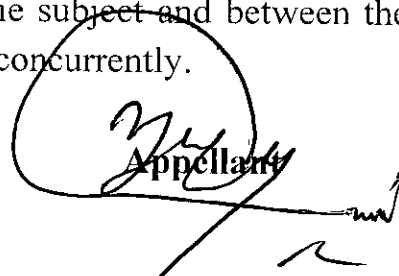
It is, therefore, prayed that On acceptance of this appeal the departmental appeal dated 03.07.2018 may kindly be accepted and the services of the appellant may also be counted for the purpose of promotion and seniority as been counted / allowed to all the similarly placed employees of the same department with all consequential benefits or Any other remedy not specifically asked for and deemed proper in the circumstances of the case may also be allowed.

Through


 ZARTAJ ANWAR
 Advocate Peshawar

NOTE:

Certified that no appeal on the same subject and between the same parties has been filed previously or concurrently.


 Appellant

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. ____/2018

Ulfat Begum, District Education Officer (female) District
Charsadda.

(Appellants)

VERSUS

Govt of Khyber Pakhtunkhwa through Chief Secretary Civil
Secretariat Khyber road, Peshawar and others.

(Respondents)

AFFIDAVIT

I, Ulfat Begum, District Education Officer (female)
District Charsadda., do hereby solemnly affirm and declare
on oath that the contents of the above appeal are true and
correct and that nothing has been kept back or concealed
from this Honourable Court



Deponent

7 Annex A
551

OFFICE OF THE DIRECTOR OF EDUCATION (SCHOOLS), N.W.F.P., PESHAWAR.

APPROVAL :-

Consequent upon the approval given by the Departmental Selection Committee in their meeting held on 9.12.1989, the following SETs are hereby allowed graded pay w.e. from the date of taking over charge after/from the date of allocation on merit, subject to the conditions given below :-

| S.No. | Name and School. | D/O Allo- cation on merit. | D/O taking over charge. | Date from which graded pay is allowed. |
|-------|------------------|----------------------------------|----------------------------------|--|
| 1 | 2 | 3 | 4 | 5 |

ZONE-I

1. Mst. Zahida Yasmin, B/O S. Ghulam-Mustafa Shah, SET, (GGMS Dabkot-S.W.A.) transferred to GGMS Kiriwan (FR-D.I. Khan), BA, B.Ed, 1984-85/4676/1200, 563/1000/D.I. Khan 8.3.1988 8.3.88 8.3.1988.

ZONE-II

Science.

1. Mst. Farhat Shaheen D/O Wali-ullah Khan, SET, GGHS, Zaida (Swabi) B.Sc. B.Ed, 1986-87/649/1100/590/1000 Mardan. 8.3.88 1.6.88 1.6.88

ARTS.

1. Mst. Intiaz Begum D/O Hamidud Din SET, GGHS, Marghuz, Mardan, BA, B.Ed, 1981/457/1000/Peshawar (2nd chance). 8.3.1988 4.5.88 4.5.88
2. Mst. Bukhtiar Begum D/O Mohammad Inayat Shah, GGCHSS, Peshawar. BA B.Ed. 1983 (Suply) 473/1000/Peshawar (2nd chance). 8.3.88 21.4.88 21.4.88
3. Mst. Ulfat Begum D/O Kifayatullah SET, GGHS, Harichand (Charsadda) MA, B.Ed, 1984-85/485/1000/Pesh. 8.3.88 17.4.88 17.4.88
4. Mst. Sushra Begum D/O Amir Nawab Khan, SET, GGHS, Dobian (Mardan) BA, B.Ed. 1984-85/482/1000/Pesh. 8.3.88 19.4.88 19.4.88
5. Mst. Nasim Akhtar D/O Karam Ilyasi SET, (GGHS Kalabat Swabi) transferred to ASDEJ (F) Nowshora, BA, B.Ed. 1984-85/475/1000/Pesh. 8.3.88 1.6.88 1.6.88
6. Mst. Tajwar Sultan D/O Ghulam Sarwar, SET, GGHS, Mathra (under transfer to GGHS Landi Arbab, Pesh.) BA, B.Ed, 1984-85/474/1000/Pesh. 8.3.88 27.11.88 27.11.88
7. Mst. Samia Jamal D/O Faujun Khan SET, GGHS, Chaakani, BA, B.Ed. 84-85/463/1000/Peshawar. 8.3.88 26.11.88 26.11.88

(N.P...2..Cont)

ATTENDED

H/M
17

8

OFFICE OF THE DIRECTOR SECONDARY EDUCATION, N.W.F. PESHAWAR.

NOTIFICATION.

The Governor N.W.F.P, in consultation with the Department Promotion Committee is pleased to award PS-17 as Selection Grade to the following Senior English Teachers/BPS-16 with effect from the dates noted against each :-

| S.No./S.No. in S/List. | Name/Designation/School | Date of award S/Grade B-17. |
|------------------------|---|-----------------------------|
| 1/351 | Bibi Zainab, SET, D/o Khazmin Gul GGHS Tehkal Bala, Peshawar. | 13.8.1995 |
| 2/351-A | Rehana Shaheen, SET D/o Mohammad Gul GGMS Saro Killy, Mohmand Agency. | 13.8.1995 |
| 3/352 | Bakht Sargand SET D/o Wali Mohammad GGHS Thana Malakan Agency. | -do- |
| 4/353 | Rozina Bibi, SET D/o Mukhtar Ullah AAEO Bajour Agency at Khar. | -do- |
| 5/354 | Pukraj Begum, SET B/o Aslam Khan, GGHS Sakha, Malakand Agy. | -do- |
| 6/355 | Nighat Shamim, SET D/O Sardar Mohammad GGHS No.2 Kchat. | -do- |
| 7/356 | Nishat Akhter, D/o Sarwar Khan GGHS Akbar Pira Nowshera. | -do- |
| 8/357 | Khurshid Borum D/o Nisar Ahmad GGHS Bazar Ahmad Khan Bannu. | -do- |
| 9/358 | Farzana Shoben D/o Rab Nawaz Khan, GGHS No.5 DI Khan. | -do- |
| 10/359 | Santaj Parveen D/o Nasir Ullah, GGMS Central Jail DI Khan. | -do- |
| 11/360 | Zarina Begum D/o H. Mohammad Jan GGHS Tarnab, Peshawar. | -do- |
| 12/361 | Nighat Yasmin D/o Mohammad Sadig ADEO(F) Peshawar. | -do- |
| 13/362 | Mumtaz Begum D/o S. Lal Badshah GG JICA MODEL School, Tour Landi Charsadda. | -do- |
| 14/363 | Mussarat Jabeen D/o Khadim Hussain GGMS Sheikhan, Kohat. | -do- |
| 15/364 | | |

AT

| | | |
|-------------------|---|-----------------|
| 79/425 | Iffat Humma D/o Mohammad Ajab Khan GGHS No.2 Mansehra. | 1.9.95 |
| 80/42 | Shaheen Akhter D/o Amir Mohammad, GGHS Togh Bala, Kohat. | 1.10.95 |
| 81/428 | Sohna Bibi D/o Abdul Kareem, GGHS No.2 Kohat. | 1.10.95 |
| 82/429 | Sajida D/o Atta Mohammad, GGHS Manglor Mansehra. | -do- |
| 83/431 | Zahida Yasmin D/o S. Ghulam Mustafa Shah GGMS Kiriwan FR Tank. | 1.4.96 |
| 84/432 | Naila Ruby D/o Amir Mohammad GGHS No.2 Kohat. | 1.4.96 |
| 85/432-A | Shamim Akhter D/o Khayal Gul, Ex-SET now working as Prl; GGHS Babri Banda, Kohat. | -do- |
| 86/434 | Nargis Rafi D/o Rafiullah GGHS Latamber, Karak. | -do- |
| 87/435 | Robina Saleem D/o Qazi Mohammad Saleem GGHS Oghi Mansehra. | -do- |
| 88/436 | Mussarat Shahnaz D/o Mahboob Elahi | -do- |
| 89/437 | Hamida Bibi D/o Ali Zaman, GGHSS Havelian Abbottabad. | -do- |
| 90/438 | Anwar Sultan D/o Niaz Niaz Moeen Now working as HM GGHS Waran Karak. | -do- |
| 91/438 | Muskan Begum D/o Kifayatullah, Ex-SET Now working as HM GGHS Shabadar Qld. | -do- |
| 92/440 | Bushra Begum D/o Amir Nawaz Khan GGHSS Pir Pai Nowshera. | -do- |
| 93/441 | Naseem Akhter D/o Karam Elahi ASDEO(F) Peshawar. | -do- |
| 94/442 | Tajwar Sultan, D/o Ghulam Serwar GGHS Landi Arbab Peshawar. | -do- |
| 95/443 | Farhat Jamal D/o Jamalud Din, GGHS No.2 Haripur. | -do- |
| 96/444 | Samia Jamal D/o Foujon Khan, GGHS Chamkani Peshawar. | -do- |
| 97/445 | Burhaniah Begum D/o Nam-e-Haq GGHS Baghicha Dheri Mardan. | -do- |
| 98/446 | Nafees Ara D/o Mian Khalil Ahmad, GGHS Dobian Swabi. | -do- |
| 99/447 | Rabia Bibi D/o Abdul Wasid, ASDEO(F) Swabi. | -do- |

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10

Endst: No. 200-330 / Genl. S/Grade/SET/W-II. Dt; Peshawar the 17/4
2000.

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

1. Accountant General, NWFP, Peshawar.
2. Director of Education, FATA, NWFP, Peshawar.
3. Director Primary Education, NWFP, Peshawar.
4. Director General of Education, Federal Government Islamabad.
5. Director Secondary Education, Punjab.
6. Section Officer (Schools) Govt. of NWFP Education Deptt; w/r to his letter No. SO(S) 1-7/99/SET/M&F, dt; 6.4.2000.
7. All the Distt. Education Officers (Female) Secy. concerned.
8. All the Distt. Edu: Officers (F) Primary concerned.
9. Distt. Accounts Officers concerned.
10. Agency Education Officers concerned.
11. Agency Accounts Officers concerned.
12. Principals G.G.H.S.S. concerned.
13. Headmistresses GGHS concerned.
14. Officials concerned.
15. S.D.E.Os (F) concerned.

Mahmuda Begum
Additional Directress Secondary
Education, NWFP, Peshawar.

M. Ishfaq/

M. Ishfaq



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

10

Approved: B

Dated Peshawar the May 23, 2018

NOTIFICATION

NO.SO(SM)E&SED/1-1/2017/Promotion BS-19 to BS-20 (MC): Consequent upon recommendation of the Provincial Selection Board in its meeting held on 15.05.2018, the Competent Authority, is pleased to promote the following Two Officers of Management Cadre of Elementary & Secondary Education Department from BS-19 to BS-20 on regular basis with immediate effect:

| S.No | Name & Present Place of Posting |
|------|--|
| 1. | Mr. Muhammad Ibrahim District Education Officer Male Dir Lower |
| 2. | Mr. Gohar Ali Khan Director DCTE, Khyber Pakhtunkhwa at Abbottabad |

2. In terms of Section 6(2) of Khyber Pakhtunkhwa Civil Servant Act, 1973 read with rule-15(1) of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) rules, 1989 the above male officers of the Management Cadre on their promotion shall be on probation for a period of one year.

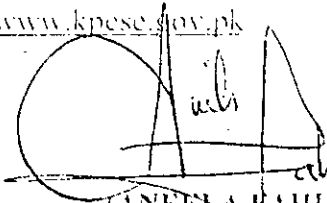
3. The postings/transfers of the above named Officers shall be notified later on.

SECRETARY

Endst: of even No. & Date

Copy forwarded to:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Principal Secretary to Chief Minister Khyber Pakhtunkhwa.
3. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. Director DCTE Khyber Pakhtunkhwa at Abbottabad.
5. District Accounts Officers Abbottabad and Dir Lower.
6. District Education Officer Dir Lower.
7. PS to Chief Secretary Khyber Pakhtunkhwa, Peshawar.
8. PS to Minister E&SE Khyber Pakhtunkhwa, Peshawar.
9. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
10. PS to Special Secretary E&SE Department, Khyber Pakhtunkhwa.
11. Incharge EMIS E&SE Department.
12. Notification can be downloaded from our website: www.kpese.gov.pk
13. Officers concerned.
14. Office order file.


(ANEELA RAHIMI) 23/05/18
SECTION OFFICER (SCHOOLS MALE)

ATTEND

11

ANNEX - C

Final Seniority List of Female Officers (Management cadre) BS-18 as it stood on 31/12/2017

| Inter Seniority # | Name of officers | Qualification | Date of Birth | Domicile | Date of 1st; Entry in Edu: Deptt | Date of Present post | Method of recruitment | BPS | Designation/ place of posting | REMARKS |
|-------------------------|--|---------------|---------------|--------------------|--|-------------------------|--------------------------|-----|---|---|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 |
| 1 | Shafqat Rehman D/O Fazal Rehman | MA BEd | 4/15/1970 | Swabi/2 | 3/1/1992 | 5/30/2011 | D/Selectee | 18 | on leave | Notification No. SO (S/F) E&SED/3-2/ 2011/DO (F) dated 30/5/2011 |
| 2 | Asmat Ara Qureshi D/O Muhammad | MA MEd | 4/10/1964 | Bannu/4 | 10/10/1990 | 5/30/2011 | do | 18 | SS GGHSS Comp: Peshawar | do |
| 3 | Dilshad Begum D/O Muhammad | MA MEd | 1/9/1968 | Swat/3 | 12/1/1988 | 5/30/2011 | do | 18 | Dy. Director (F) Directorate of E&SE KPK | do |
| 4 | Parveen Begum D/O Gul Daraz Khan | MA MEd | 1/1/1970 | Karak/4 | 5/25/1995 | 5/30/2011 | do | 18 | DEO (F) DIKhan | do |
| 5 | Naghmana Sardar D/O Sardar Hussain Khan | MSc MEd | 9/23/1967 | Haripur/5 | 8/18/2011 | 8/18/2011 | do | 18 | Ex-DEO (F) Swabi | Notification No. SO (S/F) E&SED/3-2/ 2011/DO (F) dated 18/8/2011 |
| 6 | Bibi Rizwana D/O Sikandar Khan | MA MEd | 8/4/1964 | Kurram Agency/1 | 10/12/1982 | 5/30/2011 | do | 18 | Inst: RITE (F) Kohat | Notification No. SO (S/F) E&SED/3-2/ 2011/DO (F) dated 30/5/2011 |
| 7 | Naheed Anjum D/O Shah Jehan | MA MEd | 12/9/1970 | Nowshera/2 | 3/8/2007 | 5/30/2011 | do | 18 | Deputy Director Training Directorate of E&SE KPK | do |
| 8 | Farzana Sardar D/O Sardar Khan | MA MEd | 4/2/1969 | Kohat/4 | 10/10/1990 | 5/30/2011 | do | 18 | DEO (F) Hangu | do |
| 9 | Bibi Razia D/O Gulistan Khan | MA MEd | 5/16/1970 | Karak/4 | 5/17/1988 | 5/30/2011 | do | 18 | Principal GGHSS Chokara Karak | do |

At
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| Inter See Seniority # | Name of officers | Qualification | Date of Birth | Domicile | Date of 1st; Entry in Edu: Deptt | Date of Present post | Method of recruitment | BPS | Designation/ place of posting | REMARKS |
|-----------------------|---------------------------------------|------------------|---------------|-------------|----------------------------------|----------------------|-----------------------|-----|---------------------------------|---|
| 10 | Rabia Anees D/O Abdul Aziz | MA MEd M. Phill | 5/12/1976 | Peshawar/2 | 10/1/2008 | 5/30/2011 | do | 18 | SS GGHSS Shahdhand Baba Mardan | do |
| 11 | Zuhra Begum D/O Sadullah | MA MEd M. Phill | 4/20/1977 | Moh: Agy/1 | 5/9/2002 | 5/30/2011 | do | 18 | Principal GGHSS Kalu Khan Swabi | do |
| 12 | Sabira Parveen D/O Qazi Abdur Rauf | MA MEd | 7/31/1972 | DIKhan/4 | 2/18/1999 | 5/30/2011 | do | 18 | DEO (F) Lakki | do |
| 13 | Ulfat Begum D/O Kifayat Ullah | MA MEd | 4/1/1961 | Charsadda/2 | 5/30/1997 | 5/30/2011 | do | 18 | DEO (F) Charsadda | do |
| 14 | Samina Ghani D/O Zahir-ud-Din | MA MEd | 4/15/1966 | Peshawar/2 | 3/17/1990 | 5/30/2011 | do | 18 | DEO (F) Mardan | do |
| 15 | Azra Bibi D/O Abdul Qayyum Shah | MA MEd | 4/1/1975 | S.W.Agy/1 | 9/1/1999 | 8/18/2011 | do | 18 | DEO (F) Tank | Notification No. SO (S/F) E&SED/3-2/2011/DO (F) dated 18/2/2011 |
| 16 | Shamim Akhtar D/O Rahman Gul | MSc MEd M. Phill | 8/10/1976 | Peshawar/2 | 5/30/2011 | 5/30/2011 | do | 18 | DEO (F) Swat | Notification No. SO (S/F) E&SED/3-2/2011/DO (F) dated 30/5/2011 |
| 17 | Rehana Yasmin D/O Abdul Rehman Abbasi | M MEd /ETM | 12/23/1972 | Haripur/5 | 5/30/2011 | 5/30/2011 | do | 18 | DEO (F) Battagram | do |
| 18 | Sofia Tabbasum D/O Noor ul Islam | MA MEd | 5/22/1967 | Peshawar/2 | 5/30/2011 | 5/30/2011 | do | 18 | DEO (F) Peshawar | do |
| 19 | Syeda Anjum D/O Syeda Hussain Shah | MSc MEd | 8/2/1969 | DIKhan/4 | 4/9/2011 | 8/18/2011 | do | 18 | DEO (F) Bannu | Notification No. SO (S/F) E&SED/3-2/2011/DO (F) dated 18/8/2011 |
| 20 | Zaib-un-Nisa D/O Mir Salam Khan | MA MEd | 1/29/1977 | Karak/4 | 5/30/2011 | 5/30/2011 | do | 18 | DEO (F) Kohat | Notification No. SO (S/F) E&SED/3-2/2011/DO (F) dated 30/5/2011 |

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| Inter See Seniority # | Name of officers | Qualification | Date of Birth | Domicile | Date of 1st; Entry in Edu: Deptt | Date of Present post | Method of recruitment | BPS | Designation/ place of posting | REMARKS |
|-----------------------|---|-----------------|---------------|----------|----------------------------------|----------------------|-----------------------|-----|--|---------|
| 21 | Zubaida Haneef D/O Muhammad Haneef Khan | MA MEd M. Phill | 3/12/1976 | Karak/4 | 5/30/2011 | 5/30/2011 | do | 18 | DEO (F) Mansehra | do |
| 22 | Surraya Begum D/O Aman Ullah Khan | MA MEd | 4/30/1966 | Karak/4 | 5/30/2011 | 5/30/2011 | do | 18 | Principal GGHSS Phase-III Hayatabad Peshawar | do |

Certificate

- i) That the seniority list is widely circulated.
- ii) That seniority list is undisputed/ uncontroversial
- iii) That there is no litigation pending/involved

Deputy Director (Female)
Elementary & Secondary Educaiton
Khyber Pakhtunkhwa Peshawra

ATTEST

| | | | | | | | |
|----|-----------------------|-----------|------------|-----------|------------|----------|--|
| 15 | Mst Shaheen Begum SS | MA.B.Ed | 3-3-1967 | Mardan | 9-7-1992 | 9-7-1992 | -do- SS (PS) 23 HSS Sahiwal |
| 16 | Mst Zil-e-Huma SS | MA.B.Ed | 1-1-1965 | D.I.Khan | 9-7-1992 | 9-7-1992 | -do- SS (H/C) 23 HSS No. 2 D.I.Khan on deputation |
| 17 | Mst Nuzhat Noreen SS | MA.B.Ed | 12-11-1961 | Peshawar | 9-7-1992 | 9-7-1992 | -do- SS (Eco) 23 HSS comp. P |
| 18 | Mst S.Amina Bibi SS | MA.B.Ed | 18-8-1964 | Tank | 8-12-1988 | 9-7-1992 | -do- SS (Eng) 23 HSS Tank |
| 19 | Mst Shagufta Parid SS | MA.B.Ed | 4-4-1962 | Mansehra | 22-8-1988 | 9-7-1992 | -do- SS (Eng) 23 HSS Dalahat (A) on leave |
| 20 | Mst Tehmina Noor SS | MA.B.Ed | 20-3-1966 | Peshawar | 25-6-1992 | 9-7-1992 | -do- SS (Eng) 23 HSS Jangal ich |
| 21 | Mst Ruqfa Khanum H.M | MA.B.Ed | 1-1-1962 | Swabi | 20-1-1984 | 7-9-1992 | -do- Dy: D.I.(P) Tank |
| 22 | Mst Asla Bibi H.M | M.Sc.B.Ed | 1-7-1951 | A/Abad | 23-11-1983 | 7-9-1992 | -do- H.M 23 HSS 9 madhian (man) |
| 23 | Mst Bibi Amina SS | MA.B.Ed | 25-3-1965 | Kohat | 2-8-1993 | 2-8-1993 | -do- SS (Eco) 23 HSS Jangal ich |
| 24 | Mst Neelam Zia SS | MA.B.Ed | 15-12-1966 | Charsadda | 2-8-1993 | 2-8-1993 | -do- SS (PS) 23 HSS University |
| 25 | Mst Faiza Shafi SS | M.Sc.B.Ed | 12-4-1968 | Haripur | 2-8-1993 | 2-8-1993 | -do- SS (Stat) 23 HSS Khanpur |
| 26 | Mst Naima Jan SS | MA.B.Ed | 3-2-1965 | A/Abad | 2-8-1993 | 2-8-1993 | -do- SS (Eng) 23 HSS comp. A/A |
| 27 | Mst Sobla Azim SS | M.Sc.M.Ed | 21-9-1969 | Peshawar | 2-8-1993 | 2-8-1993 | -do- SS (Home Eco) 23 HSS comp. P |
| 28 | Mst Tasleem Kausar SS | M.Sc.B.Ed | 15-11-1964 | Mardan | 2-8-1993 | 2-8-1993 | -do- SS (Stat) 23 HSS 9. Pesh |
| 29 | Mst Robina Qureshi SS | MA.B.Ed | 17-12-1966 | A/Abad | 1-12-1991 | 2-8-1993 | -do- SS (Eng) 23 HSS Lahore |
| 30 | Mst Farhat Bashir SS | MA.B.Ed | 1-11-1967 | A/Abad | 15-10-1988 | 2-8-1993 | -do- SS (Stat) 23 HSS comp. A |
| 31 | Mst Farhat Yasmin SS | M.Sc.B.Ed | 12-4-1968 | Mansehra | 29-10-1992 | 2-8-1993 | -do- SS (Stat) 23 HSS Malak |
| 32 | Mst Hina Fatima SS | M.Sc.B.Ed | 18-12-1969 | Haripur | 2-8-1993 | 1-8-1993 | -do- SS (Stat) 23 HSS comp. A/A |

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| | | | | | | | | |
|----|---------------------------|----|----------------------|------------|----------|------------|------------|---------------------|
| 34 | Mst Tasneem Naheed H.M | 11 | B.A.B.Ed | 5-11-1950 | Peshawar | 4-11-1975 | 18-10-1993 | By promotion AD |
| 35 | Mst Sajida Parveen H.M | 12 | B.A.B.Ed | 3-3-1945 | Peshawar | 6-10-1976 | 18-10-1993 | -do- gmtt PITE pa |
| 36 | Mst Parveen Akhtar H.M | 13 | M.A.B.Ed | 1-9-1951 | D.I.Khan | 12-6-1973 | 18-10-1993 | -do- H.M. (SS-5) Pa |
| 37 | Mst Tabassum Jabeen H.M | 14 | B.Sc.B.Ed | 30-11-1953 | Peshawar | 1-9-1977 | 18-10-1993 | -do- vp S.M.S. Pa |
| 38 | Mst Nusrat Mah Jabeen H.M | 15 | M.Sc.B.Ed | 16-9-1952 | D.I.Khan | 1-1-1978 | 18-10-1993 | -do- gmtt PITE Pa |
| 39 | Mst Farkhanda Akhtar H.M | 16 | B.A.B.Ed | 2-3-1951 | Hazara | 19-3-1972 | 18-10-1993 | -do- H.M. Raza Pa |
| 40 | Mst Irshad Parveen H.M | 17 | M.Sc.B.Ed | 11-5-1946 | Hazara | 28-1-1973 | 18-10-1993 | -do- H.M. Mirza |
| 41 | Mst Qamar Yasmin H.M | 18 | B.Sc.B.Ed | 16-12-1951 | D.I.Khan | 14-1-1973 | 18-10-1993 | -do- H/m Kari Ra |
| 42 | Mst Nusrat Shaheen H.M | 19 | B.Sc.B.Ed | 6-4-1955 | Hazara | 11-3-1973 | 18-10-1993 | -do- H.M. Fozal |
| 43 | Mst Nasim Akhtar H.M | 20 | M.Sc.B.Ed | 1-3-1951 | Mardan | 18-6-1974 | 18-10-1993 | -do- H.M. Salhad |
| 44 | Mst Nasim Asad H.M | 21 | B.Sc.B.Ed | 20-8-1950 | Peshawar | 7-11-1977 | 18-10-1993 | -do- H.M. Mayan |
| 45 | Mst Saeeda Akhtar H.M | 22 | M.A.B.Ed | 18-8-1948 | Peshawar | 8-11-1977 | 18-10-1993 | -do- gmtt PITE pa |
| 46 | Mst Syeda Khalida H.M | 23 | M.A.M.S. B.A.B.Ed | 1-1-1947 | Peshawar | 1-11-1965 | 18-10-1993 | -do- Dgt DO(P) Pa |
| 47 | Mst Dilshad Eano H.M | 24 | M.A.B.Ed | 1-6-1948 | Peshawar | 17-2-1979 | 18-10-1993 | -do- H.M. (SS-5) Pa |
| 48 | Mst Jehan Ara H.M | 25 | B.A.B.Ed | 4-12-1947 | D.I.Khan | 25-9-1973 | 18-10-1993 | -do- H.M. Sheikh |
| 49 | Mst Bilqees Surriya H.M | 26 | B.Sc.B.Ed | 28-10-1951 | Kohat | 17-10-1978 | 18-10-1993 | -do- H.M. S.M.S. Pa |
| 50 | Mst Chanda Bibi H.M | 27 | B.A.B.Ed | 16-12-1949 | Hazara | 2-10-1971 | 18-10-1993 | -do- gmtt PITE Pa |

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| | | | | | | | |
|----|----------------------------|-----------|------------|----------|------------|------------|-------------------------|
| 52 | Mst Sajida Parveen HLM 29 | BA.B.Ed | 26-10-1950 | A/Abad | 26-9-1974 | 18-10-1993 | do- H/m 2343 Bannu |
| 53 | Mst Noor Mahal SS | MA.B.Ed | 5-4-1949 | Bannu | 2-9-1972 | 18-10-1993 | do- SS (Urdu) 23435 m |
| 54 | Mst Mah Jabeen HLM 30 | MA.B.Ed | 6-3-1950 | Peshawar | 12-4-1975 | 18-10-1993 | do- H.m. Inst: RITA |
| 55 | Mst Imtiaz Begum HLM 31 | MA.B.Ed | 15-1-1946 | Peshawar | 18-2-1979 | 18-10-1993 | do- Inst: RITA Pesh. |
| 56 | Mst Zahida Nasreen HLM 32 | BA.B.Ed | 6-2-1950 | D.L.Khan | 2-9-1974 | 18-10-1993 | do- H.m. 2343 Ramah |
| 57 | Mst Zainab Nisa HLM 33 | BA.B.Ed | 1-1-1949 | Bannu | 13-6-1970 | 18-10-1993 | do- H.m. 2343 no. 2 |
| 58 | Mst Shamim Akhtar HLM 34 | BSc.B.Ed | 1-10-1947 | D.L.Khan | 7-12-1972 | 18-10-1993 | do- H.m. 2343 chawla |
| 59 | Mst Rubhsana Naheed HLM 35 | BA.B.Ed | 3-4-1951 | Hazara | 30-5-1973 | 18-10-1993 | do- H/m (SS-9) Campi |
| 60 | Mst Nisbat Begum H.M. 36 | M.Sc.B.Ed | 21-3-1949 | Kohat | 3-3-1976 | 18-10-1993 | do- H.m. Jangal Idhel |
| 61 | Mst Shamim Akhtar SS | MA.B.Ed | 24-1-1948 | Hazara | 1-10-1978 | 18-10-1993 | do- SS (Urdu) 23435 Sha |
| 62 | Mst Zaibun Nisa HLM 37 | BA.B.Ed | 1-4-1954 | Malakand | 1-6-1978 | 18-10-1993 | do- Inst: RITA Danga |
| 63 | Mst Jehan Ara HLM 38 | M.Sc.B.Ed | 1-4-1945 | Mardan | 22-9-1975 | 18-10-1993 | do- H.m. no. 2 ming |
| 64 | Mst Munawar Sultana SS | MA.B.Ed | 1-12-1952 | D.L.Khan | 9-9-1978 | 18-10-1993 | do- SS (Urdu) 23435 no |
| 65 | Mst Majida Bibi SS | MA.B.Ed | 23-7-1955 | A/Abad | 20-12-1978 | 18-10-1993 | do- SS (Urdu) 23435 H |
| 66 | Mst Anwar Sultan HLM 39 | BA.B.Ed | 6-12-1953 | Swat | 25-9-1973 | 18-10-1993 | do- Dy Director 900 |
| 67 | Mst Bakht Nazra H.M. 40 | BA.B.Ed | 3-1-1950 | Malakand | 22-2-1968 | 18-10-1993 | do- H.m. Khanal |
| 68 | Mst Bibi Ghufra HLM 41 | MA.B.Ed | 20-2-1952 | Swat | 12-2-1974 | 18-10-1993 | do- H.m. Khanal |

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Mst Zahida Bano HLM 43 BA.B.Ed 23-4-1944 Nowshera 17-3-1979 18-10-1993 do H.M. ASC

71 Mst Akhtar Begum HLM 44 BA.B.Ed 4-1-1947 Peshawar 12-7-1968 18-10-1993 do H.M. Malika

72 Mst Shamsia Waseem HLM 45 MA.B.Ed 30-4-1949 Peshawar 15-3-1979 18-10-1993 do govt. PITE Pesh

73 Mst Bibi Salma HLM 46 BA.B.Ed 1-2-1951 Bannu 23-4-1969 18-10-1993 do H.M. SERAI MIRA

74 Mst Zuhra Almas HLM 47 B.Sc.B.Ed 8-4-1953 Bannu 15-12-1973 18-10-1993 do govt. RITE Bann

75 Mst Rukhtaj Begum HLM 48 MA.B.Ed 15-9-1949 A/Abad 15-3-1979 18-10-1993 do H.M. (SS-5) Cam

76 Mst Bibi Asma HLM 49 B.Sc.B.Ed 1-5-1950 Hazara 14-9-1977 18-10-1993 do H.M. Dhadial

77 Mst Robina Shaheen HLM 50 BA.B.Ed 17-4-1956 Lakki 15-3-1979 18-10-1993 do VP. Hayatnaba

78 Mst Bakhtiar Faniif HLM 51 BA.B.Ed 11-9-1947 Mardan 23-9-1976 18-10-1993 do Dy. Do. (P) Mard

79 Mst Rashida Akhtar HLM 52 BA.B.Ed 1-2-1945 Peshawar 4-11-1976 18-10-1993 do H.M. Sarand (P.A.)

5. M. U. 1. 1. 1.

| | | | | | | | |
|----|----------------------------------|---------------------------------|------------|-----------|------------|------------|-------------------------------|
| 81 | Mst Bibi Mashala HLM 54 | M.A.B.Ed | 12-12-1949 | Bannu | 30-5-1973 | 18-10-1993 | do. H.M. (SS-9) C |
| 82 | Mst Fakhrun Nisa HLM 55 | M.A.B.Ed | 20-12-1948 | Mansehra | 5-12-1975 | 18-10-1993 | do. H.M. Battla |
| 83 | Mst Nasreen HLM 56 | B.A.B.Ed | 5-2-1953 | Hazara | 1-1-1978 | 18-10-1993 | do. H.M. CET EA |
| 84 | Mst Waheeda Parveen HLM 57 | M.A.B.Ed | 9-9-1951 | Peshawar | 1-11-1971 | 18-10-1993 | do. SS (PS) Camp |
| 85 | Mst Abida Khatoon HLM 58 | M.A.B.Ed | 2-3-1950 | Charsadda | 13-6-1974 | 18-10-1993 | do. VP. Un. V.B.G. |
| 86 | Mst Shahnaz Begum SS | M.A.B.Ed | 1-1-1949 | Peshawar | 5-7-1973 | 18-10-1993 | do. SS (PS) B.R.H.S. |
| 87 | Mst Syeda Arjumand Bano HLM 59 | M.Sc.B.Ed | 17-5-1950 | Kohat | 4-9-1977 | 18-10-1993 | do. H.M. No. 3 B |
| 88 | Mst Rabia Tabassum HLM 60 | B.A.B.Ed | 5-2-1954 | A/Abad | 21-5-1977 | 18-10-1993 | do. H.M. Pulra |
| 89 | Mst Farveen Akhtar HLM 61 | B.A.B.Ed | 16-12-1953 | A/Abad | 10-5-1979 | 18-10-1993 | do. H.M. Samand |
| 90 | Mst Naseem Akhtar HLM | B.A.B.Ed | 1-12-1953 | Mansehra | 10-5-1979 | 18-10-1993 | do. H.M. Affal |
| 91 | Mst Shams Akhtar HLM 63 | B.A.B.Ed | 1-8-1950 | D.I.Khan | 10-12-1976 | 18-10-1993 | do. H.M. Mansha Khal-hakhi |
| 92 | Mst Jehantab HLM 64 | M.A.B.Ed | 12-6-1946 | Kohat | 12-12-1971 | 18-10-1993 | do. Dg. Do (P) Har |
| 93 | Mst Jamila Khatoon HLM 65 | M.A.B.Ed | 20-5-1953 | Peshawar | 10-4-1979 | 18-10-1993 | do. H.M. (SS-9) C |
| 94 | Mst Nargis Bano HLM 66 | B.A.B.Ed | 1-5-1945 | Peshawar | 3-12-1971 | 18-10-1993 | do. H.M. (SS-9) C |
| 95 | Mst Safira Begum HLM 67 | B.A.B.Ed | 25-8-1950 | Peshawar | 22-11-1979 | 18-10-1993 | do. H.M. Mansha |
| 96 | Mst Syeda Inqilab Shaheen HLM 68 | B.A.B.Ed M.A.B.Ed | 1-1-1953 | Mansehra | 20-5-1979 | 18-10-1993 | do. H.M. Mansha |
| 97 | Nasim Akhtar HLM 69 | B.A.B.Ed | 10-4-1952 | Kohat | 18-11-1979 | 18-10-1993 | do. H.M. Gumbat |

S. M. I.

| | | | | | | | |
|-----|----------------------------------|---------|------------|---------------|------------|------------|-------------------|
| 99 | Mst Arifa Kausar H.M. 71 | BA.B.Ed | 22-5-1953 | Peshawar | 28-9-1975 | 18-10-1993 | do H.M. B |
| 100 | Mst Yasmin Sultan H.M. 72 | MA.B.Ed | 4-4-1951 | Peshawar | 21-1-1976 | 18-10-1993 | do H.M. B |
| 101 | Mst Surriya Akhtar H.M. 73 | BA.B.Ed | 22-1-1947 | Peshawar | 14-9-1967 | 18-10-1993 | do AD Stk |
| 102 | Mst Gul Bahar SS | MA.B.Ed | 13-1-1955 | Dir | 5-12-1976 | 18-10-1993 | do SS(urd) |
| 103 | Mst Nish Baha H.M. 74 | MA.B.Ed | 1-2-1948 | Swat | 1-5-1965 | 18-10-1993 | do H.M. N |
| 104 | Mst Chaman Bahar SS | MA.B.Ed | 3-2-1951 | Mardan | 9-3-1971 | 18-10-1993 | do SS(urd) |
| 105 | Mst Amtur Rab H.M. 75 | BA.B.Ed | 1-12-1953 | Swat | 1-11-1975 | 18-10-1993 | do H.M. B |
| 106 | Mst Farhat Begum H.M. 76 | BA.B.Ed | 14-11-1955 | Swat | 23-2-1974 | 18-10-1993 | do H.M. Teh |
| 107 | Mst Dil Arama H.M. 77 | BA.B.Ed | 1-1-1951 | Swat | 1-3-1972 | 18-10-1993 | do H.M. Bst |
| 108 | Mst Mehrun Nisa H.M. 78 | MA.B.Ed | 12-10-1950 | Swat | 3-3-1973 | 18-10-1993 | do H.M. H |
| 109 | Mst Hamida Begum H.M. 79 | BA.B.Ed | 1-3-1954 | Malakand | 20-9-1975 | 18-10-1993 | do H.M. (SS-B) |
| 110 | Mst Bibi Amina H.M. 80 | BA.B.Ed | 25-4-1957 | Kurram Agency | 1-3-1981 | 18-10-1993 | do H.M. Knt |
| 111 | Mst Shamim Akhtar H.M. 81 | MA.B.Ed | 24-2-1948 | Bannu | 3-5-1966 | 18-10-1993 | do H.M. N |
| 112 | Mst Shamim Akhtar H.M. 82 | MA.B.Ed | 20-10-1953 | Hazara | 2-12-1979 | 18-10-1993 | do H.M. B |
| 113 | Mst Khalida Addeb Khanum H.M. 83 | BA.B.Ed | 1-6-1954 | D.I.Khan | 14-12-1977 | 18-10-1993 | do H.M. Jm |
| 114 | Mst Miraj Begum SS | MA.B.Ed | 22-5-1952 | A/Abad | 29-10-1980 | 18-10-1993 | do SS(urd) Haipur |
| 115 | Mst Asia Khatoon H.M. 84 | BA.B.Ed | 1-1-1951 | D.I.Khan | 22-12-1976 | 18-10-1993 | do H.M. B |
| 116 | Mst Gul-e-Rana H.M. 85 | BA.B.Ed | 7-1-1949 | A/Abad | 4-1-1975 | 18-10-1993 | do H.M. R |

| | | | | | | | |
|-----|-------------------------------|-----------|------------|----------------|------------|------------|-----------------------------|
| 118 | Mst Akhtar Begum SS | MA.B.Ed. | 18-10-1949 | D.I.Khan | 24-12-1976 | 18-10-1993 | do-SS(Pakistan) |
| 119 | Mst Qamrun Nisa HLM 87 | MA.B.Ed | 1-6-1961 | D.I.Khan | 4-10-1970 | 18-10-1993 | do-H.M. Muz |
| 120 | Mst Khalida Akhtar SS | M.Sc.B.Ed | 11-4-1963 | Peshawar | 1-1-1994 | 1-1-1994 | By initial ssch recruitment |
| 121 | Mst Dilara Begum SS | M.Sc.B.Ed | 9-10-1962 | Mardan | 1-1-1994 | 1-1-1994 | do-SS(Chem) 28 |
| 122 | Mst Nasim Akhtar SS | M.Sc.B.Ed | 15-2-1969 | Mardan | 1-1-1994 | 1-1-1994 | do-SS(Phy) 28 |
| 123 | Mst Nargis Parveen SS | M.Sc.B.Ed | 25-3-1966 | Nowshera | 6-10-1993 | 1-1-1994 | do-SS(Bio) 28 |
| 124 | Mst Shazia Sadiq SS | M.Sc.B.Ed | 1.7.1968 | Peshawar | 8-10-1986 | 1-1-1994 | do-SS(Phy) 28 |
| 125 | Mst S.Nobahar Benti Haidar SS | MA.B.Ed | 6-9-1993 | D.I.Khan | 1-1-1993 | 1-1-1994 | do-SS(P.E) 28 |
| 126 | Mst Tasnim Shabir SS | MA.B.Ed | 17-5-1963 | Bannu | 15-1-1990 | 1-1-1994 | do-SS(H/L) 28 |
| 127 | Mst Robina Qayyum SS | MA.B.Ed | 15-1-1967 | Mardan | 1-1-1994 | 1-1-1994 | do-SS(H/L) 28 |
| 128 | Mst Sabina Shaheen SS | MA.B.Ed | 17-5-1967 | Haripur | 17-5-1993 | 17-5-1994 | do-SS(Eco) 28 |
| 129 | Mst Robina Shaheen SS | M.Sc.B.Ed | 24-6-1966 | D.I.Khan | 17-5-1993 | 17-5-1994 | do-SS(Stat) 28 |
| 130 | Mst Nayab Kaleem SS | MA.B.Ed | 27-12-1965 | Charsadda | 31-5-94 | 31-5-94 | do-SS(EM) 28 |
| 131 | Mst Rehana Yasmin SS | MA.B.Ed | 6-4-1968 | Karak | 31-5-94 | 31-5-94 | do-EX-SS(EM) 28 |
| 132 | Mst Farzana Lalsher SS | M.Sc.B.Ed | 10-10-1969 | Peshawar | 31-5-94 | 31-5-94 | do-SS(Por-EC) |
| 133 | Mst Nighat Seema SS | M.Sc.B.Ed | 1-5-1965 | Peshawar | 31-5-94 | 31-5-94 | do-SS(Home Ec) |
| 134 | Mst Nizakat Faiz SS | M.Sc.B.Ed | 14-10-1962 | Mohmand Agency | 31-5-94 | 31-5-94 | do-SS(Home Ec) |
| 135 | Mst Naheed Sherin SS | M.Sc.B.Ed | 21-10-1965 | Swat | 31-5-94 | 31-5-94 | do-SS(Home Ec) |

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|------------------------|-----------|------------|------------------------|-----------|----------|----------------------------------|
| Mst Najma Sultana SS | MA.B.Ed | 14-2-1969 | Bannu | 8-3-1999 | 8-3-1999 | -do- SS (H/E) Faisal Khan |
| Mst Gul Nar SS | MA.B.Ed | 1-2-1970 | Kohat | 8-3-1999 | 8-3-1999 | -do- SS (PS) Chahdara |
| Mst Nabila SS | MA.B.Ed | 10-2-1970 | Malakand | 8-3-1999 | 8-3-1999 | -do- SS (PS) Mandozi |
| Mst Zahida Nasreen SS | MA.B.Ed | 10-4-1963 | Bannu | 8-3-1999 | 8-3-1999 | -do- SS (Grl) Shahdand Bako |
| Mst Saeeda Bano SS | MA.B.Ed | 10-6-1970 | Dir | 8-3-1999 | 8-3-1999 | -do- SS (Grl) Sherpao |
| Mst Yasmin Gul SS | MA.B.Ed | 1-5-1966 | Charsadda | 8-6-1998 | 8-3-1999 | -do- SS (Grl) - H. m. Ayun chitr |
| Mst Bibi Halima SS | MA.B.Ed | 20-10-1964 | Chitral | 1-10-1989 | 8-3-1999 | -do- SS (Grl) Topi |
| Mst Iffat Safina SS | MA.B.Ed | 10-10-1966 | Karak | 8-3-1999 | 8-3-1999 | -do- SS (Grl) Comp. A/Abad |
| Mst Iffat Sultana SS | MA.B.Ed | 15-4-1965 | A/Abad | 5-11-1985 | 8-3-1999 | -do- SS (Grl) L. Q. Peshw |
| Mst Najmun-Nisa SS | MA.B.Ed | 18-4-1967 | Peshawar | 8-3-1999 | 8-3-1999 | -do- SS (Eng) Bahri Bando |
| Mst Nudrat Nadia SS | MA.B.Ed | 1-2-1972 | Kohat | 8-3-1999 | 8-3-1999 | -do- SS (Hameeco) Hanehin |
| Mst Salma Masood SS | M.Sc.B.Ed | 14-8-1965 | A/Abad | 8-3-1999 | 8-3-1999 | -do- SS (Hamecom) Comp. Peshw |
| Mst Sabiha Zaib SS | M.Sc.B.Ed | 21-4-1972 | Khyber Agency Peshawar | 8-3-1999 | 8-3-1999 | -do- SS (Hameeco) PITA Peshw |
| Mst Nazia Khanum SS | M.Sc.B.Ed | 6-7-1970 | Peshawar | 8-3-1999 | 8-3-1999 | -do- Ex - SS (Hameeco) BSD Peshw |
| Mst Samia Wahid SS | M.Sc.B.Ed | 23-4-1970 | Peshawar | 8-3-1999 | 8-3-1999 | -do- SS (urdu) Tahat Bai |
| Mst Nagina Tabassum SS | MA.B.Ed | 31-12-1968 | Peshawar | 8-3-1999 | 8-3-1999 | -do- Ex-SS (urdu) Shahdand B |
| Mst Hamida Begum SS | MA.B.Ed | 5-2-1966 | Mohmand Agency Swabi | 8-3-1999 | 8-3-1999 | -do- SS (urdu) Topi |
| Mst Saira Begum SS | MA.B.Ed | 4-8-1967 | Swabi | 1-12-1994 | 8-3-1999 | -do- SS (urdu) Topi |

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|-----|--------------------------------|--------------------|--------------------|----------------------|----------------------|------------------------|-------------------------------------|
| 213 | Mst Sumbal Yousaf SS | M.Sc.B.Ed | 12-2-1967 | Peshawar | 20-10-1996 | 20-10-1996 | do- SS(Hom.Eco) 98155 |
| 214 | Mst Mah-e-Rukh HLM 125 | MA.B.Ed | 7-3-1959 | Hazara | 16-4-1985 | 28-5-1997 ✓ | do- Ex. Ans. of RTE 10015/98155 etc |
| 215 | Mst Ulfat Begum HLM | MA.B.Ed | 14-1961 | Charsadda | 26-2-1986 | 28-5-1997 ✓ | do- H.M. Tangi |
| 216 | Mst Samina Fayaz HLM 520/127 | MA.M.Ed | 12-1-1966 | Bannu | 21-9-1992 | 28-5-1997 ✓ | do- H.M. Bafar Ahn Bannu |
| 217 | Mst Rana Jabeen HLM 128 | MA.B.Ed | 17-8-1962 | FR.Bannu | 9-2-1986 | 28-5-1997 ✓ | do- H.M. Mirza |
| 218 | Mst Tahira Jabeen HLM 129 | M.Sc.B.Ed | 1-5-1954 | Hazara | 22-11-1988 | 28-5-1997 ✓ | do- H.M. Serai Mirza |
| 219 | Tanveer Rashid HLM 130 | M.Sc.B.Ed | 4-5-1963 | Swat | 14-4-1991 | 28-5-1997 ✓ | do- H.M. No. 2 Sai |
| 220 | Mst Yasrab Nayab HLM 131 | MA.B.Ed | 16-6-1964 | FR.Bannu | 24-4-1988 | 28-5-1997 ✓ | do- A-D project |
| 221 | Mst Seerat Bano HLM 132 | M.Sc.B.Ed | 1-1-1957 | Mardan | 26-9-1989 | 28-5-1997 ✓ | do- H.M. Fatchpur |
| 222 | Mst Bibi Rabia SS | MA.B.Ed | 2-11-1968 | Karak | 2-10-1995 | 1-9-1997 ✓ | do- SS(HC) 98155 CA |
| 223 | Mst Shagufta Begum SS | MA.B.Ed | 13-4-1968 | Mardan | 20-10-1992 | 1-9-1997 ✓ | do- SS(HC) 98155 SA Bannu |
| 224 | Mst Riffat Nasim SS | M.Sc.B.Ed | 1-6-1963 | Karak | 1-9-1997 | 1-9-1997 ✓ | do- Ex. SS(Phy) 98155 etc |
| 225 | Mst Farzana Begum SS | M.Sc.B.Ed | 3-5-1967 | Karak | 1-9-1997 | 1-9-1997 ✓ | do- SS(Bco) 98155 LA |
| 226 | Mst Zaibun Nisa SS | M.Sc.B.Ed | 20-3-1969 | Peshawar | 1-9-1997 | 1-9-1997 ✓ | do- SS(Stat) 98155 C |
| 227 | Mst Waheeda Hashmi SS | M.Sc.B.Ed | 3-11-1969 | Peshawar | 1-9-1997 | 1-9-1997 ✓ | do- SS(Stat) 98155 HA |
| 228 | Mst Musarrat Jan SS | MA.B.Ed | 8-4-1961 | Peshawar | 1-9-1997 | 1-9-1997 ✓ | do- SS(B.A) 98155 CA |
| 229 | Mst Uzma Karim SS | M.Sc.B.Ed | 30-7-1969 | D.I.Khan | 10-10-1997 | 10-10-1997 ✓ | do- SS(Eco) 98155 No. 2 |
| 230 | Mst Naima Sabahat SS | MA.B.Ed | 20-12-1968 | A/Abad | 12-10-1989 | 10-10-1997 ✓ | do- Ex. SS(Eco) 98155 etc |

5. Nadeem
 SS(Eco) 98155 etc

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|-----|---------------------------------|--------------------|----------------------|---------------------|---------------------|----------------------|----------------------------------|
| 306 | Mst Qudsia Sherin HLM | BA.B.Ed | 8-1-1956 | Peshawar | 18-12-1982 | 21-5-1999 | do H.M. Asghar Khan (Pesh) |
| 307 | Mst Sajida Begum HLM | BA.B.Ed | 9-1-1953 | Swabi | 10-11-1979 | 21-5-1999 | do H.M. Ismail (Swabi) |
| 308 | Majida Begum HLM | BA.B.Ed | 1-4-1949 | Peshawar | 6-11-1969 | 21-5-1999 | do H.M. Bookah (Chars) |
| 309 | Mst Zarin Taj HLM | BA.B.Ed | 10-4-1949 | Mardan | 11-1-1967 | 21-5-1999 | do H.M. Shewa (Swabi) |
| 310 | Mst Hanifa Bibi HLM | BA.B.Ed | 17-3-1958 | Peshawar | 1-11-1976 | 21-5-1999 | do H.M. Umar Maina Pe |
| 311 | Mst Safia Begum HLM | BA.B.Ed | 10-4-1957 | A/Abad | 10-1-1983 | 21-5-1999 | do H.M. Siribat (Haripur) |
| 312 | Mst Riffat Begum HLM | BA.B.Ed | 17-3-1958 | Peshawar | 8-6-1982 | 21-5-1999 | do V.P. Shuja (Chars) |
| 313 | Mst Shaheena Naheed HLM | BA.B.Ed | 14-4-1952 | Peshawar | 2-5-976 | 21-5-1999 | do H.M. Wasah Colony |
| 314 | Mst Noreena Khatoon HLM | BA.B.Ed | 1-11-1953 | Peshawar | 13-10-1981 | 21-5-1999 | do H.M. Jehangira (Sw) |
| 315 | Mst Tanveer Jehan Begum H | BA.B.Ed | 30-5-1952 | Peshawar | 1-4-1977 | 21-5-1999 | do J.M. PITA Pesh, |
| 316 | Mst Zeenat Khatoon HLM | BA.B.Ed | 5-4-1959 | Mardan | 8-3-1981 | 21-5-1999 | do H.M. Yar Hussain Ch |
| 317 | Mst Shamim Akhtar HLM | BA.B.Ed | 28-9-1949 | Peshawar | 30-6-1968 | 21-5-1999 | do H.M. Akberpura (Sw) |
| 318 | Mst Ruqia Hasnain HLM | BA.B.Ed | 6-2-1955 | Hazara | 10-11-1977 | 21-5-1999 | do H.M. Attar Sherho (Maz) |
| 319 | Mst Gul Niba HLM | BA.B.Ed | 22-4-1950 | Manshra | 4-11-1970 | 21-5-1999 | do H.M. Parhena (Mansra) |
| 320 | Mst Zeenat Ara HLM | BA.B.Ed | 28-2-1950 | Peshawar | 1-7-1976 | 21-5-1999 | do H.M. Kherdgi (MSR) |
| 321 | Mst Khurshid Begum HLM | MA.B.Ed | 14-5-1944 | Peshawar | 26-8-1981 | 21-5-1999 | do H.M. V.P. Khanpur |
| 322 | Mst Shamim Akhtar HLM | BA.B.Ed | 1-6-1954 | Bannu | 12-12-1974 | 21-5-1999 | do H.M. Shahbaz Azma |
| 323 | Mst Hamida Begum HLM | BA.B.Ed | 1-2-1955 | D.I.Khan | 15-12-1975 | 21-5-1999 | do H.M. No. 8 D.I.Khan |
| 324 | Mst Gohar Sultan HLM | BA.B.Ed | 29-10-1946 | Peshawar | 28-4-1966 | 21-5-1999 | do H.M. Tamab form Pesh |

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|-----|-----------------------------------|---------------------|--------------------|----------------------------|----------------------|-----------------------|-----------------------------------|
| 421 | Mst Noorul Basar SS | M.Sc. B.Ed | 15-11-1974 | Charsadda | 2-12-2002 | 2-12-2002 ✓ | recruitment |
| 422 | Mst Kausar Tanveer SS | M.Sc. B.Ed | 16-3-1973 | A/Abad | 4-6-1999 | 2-12-2002 ✓ | -do- SS(chem) malispur |
| 423 | Mst Samina Gul SS | M.Sc. B.Ed | 2-2-1970 | A/Abad | 20-12-2000 | 2-12-2002 ✓ | -do- SS(Bio) Dhanou |
| 424 | Mst Musarrat Fida SS | MA. B.Ed | 2-10-1970 | Karak | 2-12-2002 | 2-12-2002 ✓ | -do- SS(Eng) hachi |
| 425 | Mst Safia Begum SS | M.Sc. B.Ed | 6-1-1970 | Malakand | 2-12-2002 | 2-12-2002 ✓ | -do- SS(chem) Sabshah |
| 426 | Mst Fozia Hina SS | M.Sc. B.Ed | 10-8-1972 | A/Abad | 18-2001 | 2-12-2002 ✓ | -do- SS(stat) Dhanou |
| 427 | Mst Saba Noor H.M. 254 | MA. M.Ed | 20-3-66 | Malakand Agency | 13-11-194 | 30-12-2002 | -do- H. M. Prangcha |
| 428 | Mst Farah Naz H.M. 255 | M.Sc. B.Ed | 25-12-1969 | Haripur | 2-10-1999 | 30-12-2002 ✓ | -do- H. M. Bagretari |
| 429 | Mst Saeeda Bano SS | MA. B.Ed | 13-4-1949 | Peshawar | 11-2-1975 | 27-5-2003 ✓ | By promotion SS(ssl) co |
| 430 | Mst Nashaman Ara SS | MA. B.Ed | 17-11-1950 | Haripur | 19-4-1979 | 27-5-2003 ✓ | -do- SS(ssl) R. Hafiz |
| 431 | Mst Nasim Akhtar SS | MA. B.Ed | 22-1-1950 | A/Abad | 6-7-1976 | 27-5-2003 ✓ | -do- SS(HK) Dhanou |
| 432 | Mst Naheed Begum SS | MA. B.Ed | 22-7-1959 | Malakand | 25-6-1979 | 27-5-2003 ✓ | -do- SS(ssl) Sabshah |
| 433 | Mst Gulshan Parveen SS | MA. B.Ed | 1-3-1951 | D. L. Khan | 2-5-1976 | 27-5-2003 ✓ | -do- SS(ssl) Tanh |
| 434 | Mst Shakila Yasmin SS | MA. B.Ed | 1-5-1955 | Mardan | 14-1-1985 | 27-5-2003 ✓ | -do- SS(ssl) Pirpai |
| 435 | Mst Kishwar Begum SS | MA. B.Ed | 18-8-1947 | Peshawar | 9-12-1964 | 27-5-2003 ✓ | -do- SS(ssl) Mathra |
| 436 | Mst Khurshid Begum SS | MA. B.Ed | 24-6-1954 | Peshawar | 4-3-1980 | 27-5-2003 ✓ | -do- SS(ssl) L. G. Pesh |
| 437 | Mst Razia Sultana SS | MA. B.Ed | 15-4-1958 | Bannu | 1-2-1982 | 27-5-2003 ✓ | -do- SS(HK) S. Mirza Tann Pesh |

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|----------------|------------------------------|----------------------|---------------------|---------------------|-----------------------|----------------------|---------------------------------------|
| 440 | Mst Rughtaj Bibi SS | MA.I.T. | 15-5-1952 | A/Abad | 15-1-1986 | 27-5-2003 | do-SS(Chem) <i>Sabihul</i> |
| 441 | Mst Alam Ara SS | M.Sc.B.Ed | 5-6-1957 | Mardan | 5-11-1981 | 27-5-2003 | do-SS(Bio) <i>Sabihul</i> |
| 442 | Mst Nafees Khanum SS | M.Sc.B.Ed | 14-7-1960 | Nowshera | 13-11-1986 | 27-5-2003 | do-SS(Bio) <i>Nathra</i> |
| 443 | Mst Chaman Ara SS | M.Sc.B.Ed | 9-2-1959 | Peshawar | 24-12-1984 | 27-5-2003 | do-SS(Math) <i>Sherpac</i> |
| 444 | Mst Bibi Zainab SS | M.Sc.B.Ed | 17-7-1956 | Peshawar | 15-11-1983 | 27-5-2003 | do-SS(Chem) <i>Sherpac</i> |
| 445 | Mst Zahida Khanum SS | MA.B.Ed | 12-3-1954 | A/Abad | 22-10-1981 | 27-5-2003 | do-SS(HK) <i>Kat Najib</i> |
| 446 | Mst Fehmida Noreen SS | MA.B.Ed | 8-10-1956 | Mansehra | 5-3-1986 | 27-5-2003 | do-SS(HK) <i>Baffa</i> |
| 447 | Mst Riffat Naz SS | M.Sc.B.Ed | 15-3-1956 | Mardan | 21-12-1989 | 27-5-2003 | do-SS(Chem) <i>Nathra</i> |
| 448 | Mst Mamoona Hamid SS | M.Sc.B.Ed | 22-1-1964 | A/Abad | 22-12-1989 | 27-5-2003 | do-SS(Chem) <i>Comp's M</i> |
| 449 | Mst Shahida Begum SS | M.Sc.B.Ed | 1-1-1963 | Mardan | 26-1-1988 | 27-5-2003 | do-SS(Bio) <i>Shahdani</i> |
| 450 | Mst Naheed Haidar SS | MA.B.Ed | 19-10-1957 | Kohat | 11-9-1985 | 27-5-2003 | do-SS(Eco) <i>Babri Bari</i> |
| 451 | Mst Dilshad Begum SS | M.Sc.B.Ed | 16-12-1961 | Bannu | 27-9-1968 | 27-5-2003 | do-SS(Chem) <i>S.K. Bab</i> |
| 452 | Mst Alam Taj SS | M.Sc.B.Ed | 7-4-1956 | Mansehra | 30-10-1984 | 27-5-2003 | do-SS(Comp) <i>Comp's A/2</i> |
| 453 | Mst Siyyara Begum SS | MA.B.Ed | 10-5-1964 | Mardan | 28-9-1989 | 27-5-2003 | do-SS(HK) <i>Kahilch</i> |
| 454 | Mst Nasreen Tabassum SS | MA.B.Ed | 15-12-1958 | A/Abad | 18-5-1989 | 27-5-2003 | do-SS(HK) <i>Comp's A/2</i> |
| 455 | Mst Farzesa Akhtar SS | M.Sc.B.Ed | 18-11-1961 | Peshawar | 6-3-1990 | 27-5-2003 | do-SS(Chem) <i>University</i> |
| 456 | Mst Parveen Akhtar SS | MA.B.Ed | 1-1-1958 | Swat | 24-3-1990 | 27-5-2003 | do-SS(HK) <i>Odigram</i> |

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|-----|------------------------|-------------------|------------|-------------------|------------|-----------|---|
| 476 | Mst Miasarvutqar SS | | | | 8-11-1994 | 27-5-2003 | SS(Chem) H. M. S. H. Karim Farkhi (Karak Agency) |
| 477 | Mst Safia Khatun SS | | | | | | |
| 478 | Mst Saeeda Tabassum SS | M.Sc.B.Ed | 1-4-1965 | Swabi | 1-8-1991 | 27-5-2003 | -do- SS(Chem) Ghazi |
| 479 | Mst Bibi Amina SS | M.Sc.B.Ed | 8-11-1967 | Nowshera | 29-3-1988 | 27-5-2003 | -do- SS(Chem) Laha |
| 480 | Mst Abida Akber SS | M.Sc.B.Ed | 14-5-1965 | Charsadda | 20-5-1992 | 27-5-2003 | -do- SS(Bio) Sheroo |
| 481 | Mst Saeeda Jan SS | MA.B.Ed | 9-11-1952 | Dir | 9-12-1986 | 27-5-2003 | -do- SS(H/c) Timargan (Dir) |
| 482 | Mst Naheed Begum SS | M.Sc.B.Ed | 10-4-1967 | Swat | 8-11-1994 | 27-5-2003 | -do- SS(Bio) Odigram |
| 483 | Mst Saeeda Begum SS | MA.B.Ed | 1-12-1961 | Mardan | 16-5-1993 | 27-5-2003 | -do- SS(Bio) Shalidand Babar |
| 484 | Mst Aisha Yasmin SS | MA.B.Ed | 24-11-1955 | Peshawar | 10-1-1983 | 27-5-2003 | -do- SS(H/c) Shaideh (MSR) |
| 485 | Naima Ambreen Anjum SS | MA.B.Ed | 18-4-1964 | D.L.Khan | 1-9-1983 | 27-5-2003 | -do- SS(H/c) Kalachi (MS) |
| 486 | Mst Ambreen Raza SS | MA.B.Ed | 14-4-1963 | Bannu | 4-9-1984 | 27-5-2003 | -do- SS(Ed) S.K. Bala |
| 487 | Mst Mumtaz Begum SS | MA.B.Ed | 14-8-1953 | Mansehra | 14-9-1985 | 27-5-2003 | -do- SS(H/c) oghi |
| 488 | Mst Bushra Begum SS | M.Sc.B.Ed M.Ed | 4-12-1962 | Khar B. Agency | 24-9-1989 | 27-5-2003 | -do- SS(Ply) Fijrat |
| 489 | Mst Nasim Shahi SS | MA.B.Ed | 1-1-1964 | Swat | 1-3-1987 | 27-5-2003 | -do- SS(Eng) Kabeel |
| 490 | Mst Banaris Begum SS | MA.B.Ed | 12-2-1968 | Karak | 30-11-1988 | 27-5-2003 | -do- SS(H/c) Chawshari |
| 491 | Mst Nighat Akhtar SS | M.Sc.B.Ed | 18-9-1968 | Swat | 2-3-1987 | 27-5-2003 | -do- SS(Bio) Odigram |
| 492 | Mst Riffat Aziz SS | M.Sc.B.Ed | 1-3-1966 | Mansehra | 7-2-1990 | 27-5-2003 | -do- SS(Bio) Nalibpur |
| 493 | Mst Tabassum Jabeen SS | M.Sc.B.Ed | 6-12-1968 | Nowshera | 3-5-1988 | 27-5-2003 | -do- SS(Maths) Nowshera (Kohat Agency) |
| 494 | Mst Yasmin Akhtar SS | MA.B.Ed | 28-5-1964 | Kohat | 6-1-1991 | 27-5-2003 | -do- SS(Eng) Purpai |

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|-----|--------------------------|-----------|------------|----------------------|----------------------|-----------|------------------------|
| 496 | Mst Yasmin Usman SS | M.Sc.B.Ed | 10-4-1966 | Phar | 3-3-1993 | 27-5-2003 | SS(Phy) Chahmani |
| 497 | Mst Bibi Shabnamzeb SS | M.Sc.B.Ed | 22-5-1968 | B.Agency Mansehra | 29-11-1994 | 27-5-2003 | do SS(Bio) Havelian |
| 498 | Mst Naheed Begum SS | M.Sc.B.Ed | 14-4-1966 | Mardan | 7-11-1992 | 27-5-2003 | do SS(Bio) BSB Pesh |
| 499 | Mst Azhar Jan SS | M.Sc.B.Ed | 20-10-1968 | Charsadda | 12-12-1994 | 27-5-2003 | do SS(Bio) Phozikhatta |
| 500 | Mst Yasmin Ara Bibi SS | MA.B.Ed | 19-2-1966 | Mardar | 28-3-1996 | 27-5-2003 | do SS(HC) Ruzam |
| 501 | Mst Farzana Jabeen SS | MA.B.Ed | 12-1-1970 | A/Abad | 28-3-1996 | 27-5-2003 | do SS(Eng) Dhanton |
| 502 | Mst Nighat Qazi SS | MA.B.Ed | 18-8-1967 | Haripur | 13-11-1994 | 27-5-2003 | do SS(Eng) K.T. Ship |
| 503 | Mst Asia Sardar SS | M.Sc.B.Ed | 10-6-1973 | Nowshera | 1-3-1999 | 27-5-2003 | do SS(Honors) Topi |
| 504 | Mst Laila Tabassum SS | MA.B.Ed | 20-9-1970 | Nowshera | 22-5-1995 | 27-5-2003 | do SS(Eng) Hayatnagar |
| 505 | Mst Roohul Amin Laiqa SS | M.Sc.B.Ed | 17-10-1971 | D.I.Khan | 27-4-1996 | 27-5-2003 | do SS(Stat) Peshawar |
| 506 | Mst Noushaba SS | M.Sc.B.Ed | 18-5-1969 | Peshawar | 18-2-1999 | 27-5-2003 | do SS(Phy) Nathra |
| 507 | Mst Sumaira Taj SS | M.Sc.B.Ed | 29-5-1970 | Charsadda | 1-12-1990 | 27-5-2003 | do Ex-SS(Phy) Shergo |
| 508 | Mst Robina Hayat SS | M.Sc.B.Ed | 18-2-1959 | S.W.A | 18-4-1973 | 27-5-2003 | do SS(Stat) Parachinar |
| 509 | Mst Farzana Safdar SS | MA.B.Ed | 10-7-1962 | Haripur | 10-1-95 21-9-1999 | 27-5-2003 | do SS(Eco) K.T. Ship |
| 510 | Mst Ghazala Yasmin SS | MA.B.Ed | 13-7-1969 | D.I.Khan | 12-7-1990 | 27-5-2003 | do SS(Eng) Kulachi |
| 511 | Mst Ruqia Jabeen SS | MA.B.Ed | 20-8-1963 | Mansehra | 10-6-1985 | 27-5-2003 | do SS(Ps) Baffa |
| 512 | Mst Naheeda SS | MA.B.Ed | 15-3-1964 | Mansehra | 5-12-1988 | 27-5-2003 | do SS(Eco) Havelian |
| 513 | Mst Saeeda Khaloon SS | MA.B.Ed | 2-5-1959 | Bonnu | 1-12-1986 | 27-5-2003 | do SS(Eco) Havelian |

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|-----|---------------------------|-----------|------------|----------|------------|-----------|------------------------------------|
| 511 | Mst Saeeda Milled SS | M.A.B.Ed | 7-11-1973 | Peshawar | 21-7-1999 | 27-5-2003 | do-SS(eco) Pesh |
| 515 | Mst Shabla Parveen SS | M.A.B.Ed | 5-4-1969 | Peshawar | 1-9-1992 | 27-5-2003 | do-SS(Eng) BSD Pesh |
| 516 | Mst Fauzia Jamil SS | M.Sc.B.Ed | 1-5-1967 | Kohat | 12-7-1999 | 27-5-2003 | do-SS(Phy) Jangal |
| 517 | Mst Shabmilla Tabassum SS | M.Sc.B.Ed | 12-4-1969 | D.I.Khan | 18-2-1999 | 27-5-2003 | do-SS(Bio) Kulachi (D.I.K.) |
| 518 | Mst Rohila Rehmat SS | M.Sc.B.Ed | 15-4-1970 | Bannu | 12-7-1999 | 27-5-2003 | do-SS(Ed) No. 2 Bannu |
| 519 | Mst Zubaida Akber SS | M.Sc.B.Ed | 26-1-1967 | Swabi | 12-7-1999 | 27-5-2003 | do-SS(Phy) Haber |
| 520 | Mst Farzana Bibi SS | M.Sc.B.Ed | 1-2-1963 | Lakki | 12-7-1999 | 27-5-2003 | do-SS(Phy) H. Masood No. 2 |
| 521 | Mst Shabana Sadiq SS | M.Sc.B.Ed | 1-7-1970 | Haripur | 12-2-1995 | 27-5-2003 | do-SS(Phy) K.T. Ship |
| 522 | Mst Bushra SS | M.Sc.B.Ed | 3-2-1969 | Dir | 12-7-1999 | 27-2-2003 | do-SS(eco) Din Khan |
| 523 | Mst Attia Bano SS | M.Sc.B.Ed | 2-7-1972 | Mansehra | 21-9-1999 | 27-5-2003 | do-SS(Ed) Balabot |
| 524 | Mst Hamida Bano SS | M.A.B.Ed | 15-9-1969 | Swat | 12-9-1993 | 27-5-2003 | do-SS(Eng) Ahora Kuruk |
| 525 | Mst Sabiha SS | M.Sc.B.Ed | 20-4-1970 | Swabi | 23-6-1997 | 27-5-2003 | do-SS(Math) Haber |
| 526 | Mst Zarifa Rani SS | M.Sc.B.Ed | 2-8-1965 | Peshawar | 12-7-1999 | 27-5-2003 | do-SS(Phy) University Town |
| 527 | Mst Nagina Sahil SS | M.Sc.B.Ed | 1-8-1970 | Peshawar | 12-7-1999 | 27-5-2003 | do-SS(Phy) BSD Pesh |
| 528 | Mst Tahira Tabassum SS | M.Sc.B.Ed | 13-4-1973 | Nowshera | 2-7-1997 | 27-5-2003 | do-SS(Math) Sahabat |
| 529 | Mst Bakht Bibi SS | M.Sc.B.Ed | 6-1-1972 | Peshawar | 12-7-1999 | 27-5-2003 | do-SS(Phy) Nowshera |
| 530 | Mst Najia Ambreen SS | M.Sc.B.Ed | 25-12-1976 | Peshawar | 1-8-1996 | 28-8-2003 | By initial recruitme SS(Phy) Kanda |
| 531 | Mst Jamila Begum M 7-56 | M.A.B.Ed | 20-3-1968 | D.I.Khan | 10-11-1994 | 28-8-2003 | do-H.M. Hajirabad (Dir) |
| 532 | Mst Shaista Gul SS | M.A.B.Ed | | Malakand | | | |

S. Tahir

SECRETARY TO GOVT: OF NWFP
SCHOOLS AND LITERACY DEPTT:

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Sealed, D

IN THE PESHAWAR HIGH COURT PESHAWAR

W P No. 42857 2018



Ulfat Begum, District Education Officer (female)
District Charsadda.

(Petitioners)

VERSUS

1. Govt of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariat Khyber road, Peshawar.
2. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Khyber road, Peshawar
3. Secretary to Government of Khyber Pakhtunkhwa Establishment Department Civil Secretariat Khyber road, Peshawar.

(Respondents)

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF THE ISLAMIC REPUBLIC
OF PAKISTAN, 1973

Prayer in Writ Petition:

On acceptance of this writ petition an appropriate writ may please be issued by declaring the acts and omission of the respondents whereby they are discriminating in respect of the Petitioner; the services of the similarly placed colleagues were counted from the date of initial appointment in the department and on the basis's of which promoted to higher posts, But refuse the same to the petitioner, Petitioner serving the Elementary and Secondary Education department since 1987 on regular basis, this discriminatory treatment meted out to the petitioner is highly illegally, unlawful, without lawful authority, hence the petitioner deserve similar treatment in view of the reported cases of the apex court i.e. SCMR 1996 Page 1185, 2009 SCMR Page 1 etc, thus the services of the petitioner may please be counted as done to the colleagues of the petitioner

ATTESTED
EXAMINER
Peshawar High Court
27 SEP 2018

FILED TODAY

Deputy Registrar

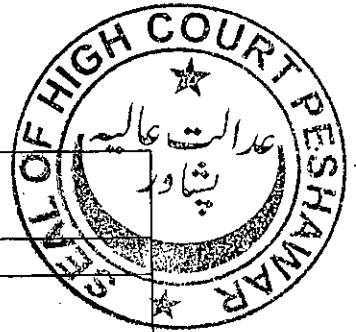
31 AUG 2018

ATTESTED

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IN THE PESHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET



| Date of order or proceedings. | Order or other proceedings with signature (s) of Judge(s) |
|-------------------------------|--|
| (1) | (2) |
| 18.09.2018. | <p><u>W.P. No.4265-P/2018</u></p> <p><u>Present:</u> Mr. Zartaj Anwar, Advocate for petitioner.</p> <p style="text-align: center;">***</p> <p><u>MUHAMMAD NASIR MAHFOOZ, J:-</u> The petitioner has filed the instant petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 with the following prayer:</p> <p>On acceptance of this writ petition an appropriate writ may please be issued by declaring the acts and omission of the respondents whereby they are discriminating in respect of the petitioner, the services of the similarly placed colleagues were counted from the date of initial appointment in the department and on the basis of which promoted to higher posts, but refuse the same to the petitioner, petitioner serving the Elementary and Secondary Education Department since 1987 on regular basis, this discriminatory treatment meted out to the petitioner is highly illegally, unlawful, without lawful authority, hence the petitioner deserve similar treatment in view of the reported cases of the apex court i.e. SCMR 1996 Page-1185, 2009 SCMR Page-1 etc, thus the services of the petitioner may please be counted as done to the colleagues of the petitioner with arrears and back benefits.</p> |

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ATTESTED

ATTESTED
EXAMINER
Peshawar High Court
27 SEP 2018



2. We have heard learned counsel for the petitioner and have gone through the record.

3. In the instant writ petition, petitioner is aggrieved of the action of respondents whereby she has not been promoted to the higher post whereas her junior has been granted promotion to BPS-20. No doubt, that the petitioner is civil servant and her services are governed by the KPK Civil Servants Act 1973, hence, any civil servant aggrieved of any decision and relating to terms and conditions of service has got remedy to invoke jurisdiction of the Provincial Services Tribunal. The instant matter also relates to the terms and conditions of service, therefore, petitioner may adopt proper remedy as available under the law.

The writ petition is therefore disposed of accordingly.

[Signature]

CHIEF JUSTICE

[Signature]
JUDGE

6830

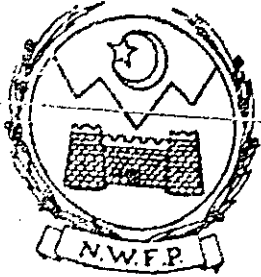
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 Date of Presentation of Application *27/9/18*
 No of Pages *9*
 Copying Fee.....
 Urgent Fee *36*
 Total.....
 Date of Preparation of Report *27/9/18*
 Date of Delivery of Report *27/9/18*
 Received By *[Signature]*

[Signature]
 CERTIFIED TO BE TRUE COPY
 EXAMINEE RASHID
 Peshawar High Court, Peshawar
 Attested Under Article 175
 of the Constitution of Pakistan
 27 SEP 2018

Shahid Ali PS

(DB) Hon'ble Mr. Justice Waqar Ahmad-Seth, C.J. and
Hon'ble Mr. Justice Muhammad Nasir Mahfooz

ATTESTED



**GOVERNMENT OF NWFP
ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT
Dated Peshawar the 04-05-2009**

NOTIFICATION

No. SO(G)/E&SE/1-76/08/M&T: In pursuance of the provision contained in sub-rule (2) of rule 3 of the North-west Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, and in supersession of this Department's Notification No.SOG/S&LD/1-28/2003/Vol.II dated: 9-4-2009 of Elementary & Secondary Education Department, in consultation with the Establishment Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 5 of the Appendix to the Notification which will be applicable to the posts of School Management Cadre in the Elementary and Secondary Education Department, as specified in column 2 of the said Appendix.

APPENDIX

| S.NO | NOMENCLATURE OF POST | MINIMUM QUALIFICATION FOR INITIAL RECRUITMENT/TRANSFER | AGE LIMIT | METHOD OF RECRUITMENT |
|------|---|---|-------------|---|
| 1. | 2. | 3. | 4. | 5. |
| 1. | Director (Elementary & Secondary) and Director (Curriculum & Teacher Education) COMBINED. | | | By selection on merit from amongst Executive District Officer and Additional District Officer (COMBINED), with at least seventeen years service in BPS-17 and above or twelve years service in BPS-17 as the case may be. |
| 2. | Executive District Officers/ Additional Director in the Schools (COMBINED) | i. PH.D in Education with at least seven years teaching/ administrative experience in Govt recognized educational institution /office; or ii. M.Phill in Education with at least nine years teaching / | 35-50 years | By initial recruitment in the following manner (a) Forty percent by initial recruitment from amongst open market ; and (b) Sixty percent by initial recruitment from amongst the Teaching Cadre having the qualification as mentioned in Column No. |

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|--|--|--|--|--|
| | | administrative experience in Govt recognized educational institution/office; or | | |
| | | iii. M.A/M.Sc in second division with M.Ed/M.A (Education)/ M.A (Education Planning and Management) or equivalent qualification with at least twelve years teaching/administrative experience in Govt recognized educational institution/office. | | |

SCHOOLS MANAGEMENT CADRE (MEN'S SECTION)

| | | | | |
|----|--|---|-------------|--|
| 1. | District Officers/Deputy Director /Deputy Director Teacher Education and Curriculum. | i. PH.D in Education and two years teaching/ administrative experience in Govt recognized Education institution/office; or ii. M.Phill in Education and three years teaching /administrative experience in Govt recognized educational institution/office; or iii. M.A/M.Sc in second Division with M.Ed/M.A (Education)/ M.A (Education Planning and Management) or equivalent qualification with at least five years teaching /administrative experience in Govt recognized educational institution/office. | 25-45 years | By initial recruitment in the following manner: (a) Forty percent by initial recruitment from amongst open market ; and (b) Sixty percent by initial recruitment from amongst the Teaching Cadre having the qualification as mentioned in Column No.3. |
| 2. | Deputy District Officers/Assistant Director | M.A/M.Sc in second division with B.Ed and five years teaching /administrative experience in Govt recognized Educational institution/ | 21-40 years | By initial recruitment in the following manner: (a) Forty percent by initial recruitment from amongst open market ; and |

| | | | | |
|----|-----------------------------|---|-------------|--|
| | | office. | | (b) Sixty percent by initial recruitment from amongst the Teaching Cadre having the qualification as mentioned in Column No.3. |
| 3. | Assistant District Officers | B.A/B.Sc in second division with B.Ed and five years teaching/administrative experience in Govt recognized education institution /office. | 25-35 years | By initial recruitment |

SCHOOLS MANAGEMENT CADRE (WOMEN'S SECTION)

| | | | | |
|----|---|--|-------------|---|
| 1. | District Officers/Deputy Director/Deputy Director Teacher Education and Curriculum. | <p>i. PH.D in Education and two years teaching/ administrative experience in Govt recognized Education institution/office; or</p> <p>ii. M.Phil in Education and three years teaching /administrative experience in Govt recognized educational institution/office; or</p> <p>M.A/M.Sc in second Division with M.Ed/M.A (Education)/ M.A (Education Planning and Management) or equivalent qualification with at least five years teaching /administrative experience in Govt recognized educational institution/office.</p> | 25-45 years | <p>By initial recruitment in the following manner:</p> <p>(a) Forty percent by initial recruitment from amongst open market ; and</p> <p>(b) Sixty percent by initial recruitment from amongst the Teaching Cadre having the qualification as mentioned in Column No.3.</p> |
| 2. | Deputy District Officers/Assistant Director. | M.A/M.Sc in second division with B.Ed and five years teaching /administrative experience in Govt recognized Educational institution/ office. | 21-40 years | <p>By initial recruitment in the following manner:</p> <p>(a) Forty percent by initial recruitment from amongst open market ; and</p> <p>(b) Sixty percent by initial recruitment from amongst the Teaching Cadre having the qualification as mentioned in Column No.3.</p> |

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| | | | | |
|----|-----------------------------|---|-------------|------------------------|
| 3. | Assistant District Officers | B.A/B.Sc in second division with B.Ed and five years teaching/administrative experience in Govt recognized education institution /office. | 21-35 years | By initial recruitment |
| | | | | |

Endst No. SO(G)/E&SE/1-76/08/M&T

Copy is forwarded to:

dated 04-05-2009

SECRETARY TO GOVERNMENT OF NWFP
ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT.

1. All Administrative Secretaries to Government of NWFP.
2. Secretary to Governor NWFP.
3. Secretary to Chief Minister, NWFP.
4. Chairman Public Service Commission, NWFP, Peshawar.
5. All Directors in Elementary & Secondary Education in NWFP.
6. All Executive District Officer E&S Education in NWFP.
7. Director Information with the request to give wide publicity.
8. The Manager, Govt: Printing Press Peshawar for publication in the next issue of Govt: Gazzatte.
9. PS to Minister for Elementary & Secondary Education NWFP, Peshawar.
10. PS to Secretary Elementary & Secondary Education Department.
11. PS to Additional Secretary E&S Education Department.
12. PA to Deputy Secretary E&S Education Department.
13. All Section Officer/Planning Officer, E&S Education Department, NWFP, Peshawar.

S.O (Schools)

ATTESTED

M. Ayub
SECTION OFFICER (GENERAL)

ATTESTED



36

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the October 7th, 2016

NOTIFICATION

NO. SO(S/F)E&SED/1-3/2016/PSB/Promotion/BS-17 to BS-18: On the recommendations of the Provincial Selection Board, the Competent Authority (Chief Minister Khyber Pakhtunkhwa) is pleased to promote the following female officers (Teaching Cadre) of Elementary & Secondary Education Department from BS-17 to BS-18 on regular basis with immediate effect: -

| S# | Name of Officer and School Address |
|----|--|
| 1 | Mst Dilafroz H.M GGHS Baghpur Dheri Haripur |
| 2 | Nusrat Bibi d/o Abdul Manan DDEO (F) Dir Lower |
| 3 | Mst Nudrat Nadia SS (Eng) GGHSS Hayatabad Peshawar. |
| 4 | Mst Sima Gul d/o Siffat Khan H.M GGHS Miran Shah NWA. |
| 5 | Mst Bilquis Sethi SS (Econ) d/o Abdul Wadud Sethi GGHSS Akbarpura Nowshera |
| 6 | Mst Abida Akber SS GGHSS Sherpao CHD. |
| 7 | Mst Naheed Begum SS GGHSS No.2 Saidu Sharif Swat. |
| 8 | Mst Saeeda Begum SS d/o Qasim Jan GGHSS Khazana Dheri Mardan. |
| 9 | Mst Naima Ambreen Anjum SS d/o Ahmad Din GGHSS No.5 DIK. |
| 10 | Mst Ambreen Raza SS d/o Raza Khan GGHSS Sikandar Khel Bala Bannu |
| 11 | Mst Nasim Shahi SS d/o M.Pervaiz GGHSS Kabal Swat. |
| 12 | Mst Nighat Akhtar SS d/o Said Muhammad GGHSS Odigram Swat. |
| 13 | Mst Riffat Aziz SS d/o Azizur Rehman GGHSS Ghari Habibullah Mansehra. |
| 14 | Mst Tabassum Jabeen SS d/o Usman ud Din GGHSS Nowshera Kalan. |
| 15 | Mst Yasmin Akhtar SS d/o Abdur Rehman GGHSS Pir Pai Nowshera. |
| 16 | Mst Fozia Barlas SS d/o Masaod Bakht Mirza GGHSS No.1 Karak |
| 17 | Mst Bibi Shabnamzeb SS (Bio) d/o M.Aurazeb GGHSS Malak Pura ATD. |
| 18 | Mst Naheed Begum SS d/o Sher Afzal GGHSS Hayatabad Peshawar |

ATTESTED

| S# | Name of Officer and School Address | Proposed place of Posting | Remarks |
|-----|--|--|------------------------------|
| 359 | Mst. Ghazala Anjum SS (Physics) BS-17 GGHS Nowshera Kalan working against BS-18 post (wrong posting) | SS (Physics) BS-17 GGHS Nowshera Cantt | A.V.P |
| 360 | Mst. Naveeda Inst: BS-18 RITE (F) Peshawar (due for promotion to BS-19) | Principal (BS-19) GGHS Matta Palangzai Charsadda | A.V.P in her own pay & scale |
| 361 | Mst. Bibi Rubina H/M BS-17 GGHS Jabori Mansehra | SS BS-17 GGHS Rich Bin A/Abad | Already adjusted |
| 362 | Mst. Khair-un-Nisa H/M BS-17 GGHS Shamshi Khel Bannu working against BS-18 post (wrong posting) | H/M BS-17 GGHS Taziri Bezin Khel Bannu | Vice S.No.196 |
| 363 | Mst. Fehmida Nasreen Principal BS-18 GGHS No.3 DIKhan (due for promotion to BS-19) | Principal (BS-19) GGHS Kulachi DIKhan | A.V.P in her own pay & scale |
| 364 | Mst. Yaseen Gul Principal BS-18 GGHS Dhakki Charsadda (due for promotion to BS-19) | Principal (BS-19) GGHS Sherpao Charsadda | A.V.P in her own pay & scale |
| 365 | Mst. Tahira Yasmin SS (Phy) BS-17 GGHS No.2 DIKhan working against BS-18 post (wrong posting) | SS (Physics) BS-17 GGHS Daraban Kalan DIKhan | A.V.P |
| 366 | Mst. Kiran Sabin SS (Urdu) BS-17 GGHS Behali Mansehra | SS (Urdu) BS-17 GGHS Malikpura A/Abad | Vice S.No.253 |
| 367 | Mst. Shahida Begum SS (Islamiyat) BS-17 GGHS Kandari Mardan | SS (Islamiyat) BS-17 GGHS Toru Mardan | Vice S.No.132 |
| 368 | Mst. Ifat Sultana Vice Principal BS-18 GGHS A/Abad (due for promotion to BS-19) | Principal (BS-19) GGHS Hajia Gali A/Abad | A.V.P in her own pay & scale |
| 369 | Mst. Nazia Gul SS (Stat) BS-17 GGHS Dhakki Charsadda | SS (Stat) BS-17 GGHS Umerzai Charsadda | A.V.P |
| 370 | Mst. Nafees Jan H/M BS-17 GGHS Muhammad Akbar Tank | H/M BS-17 GGHS Yar Muhammad Koroona Tank | A.V.P |
| 371 | Mst. Robina Shaheen H/M BS-17 GGHS Tawara Mansehra (MA Urdu) | SS Urdu (BS-17) GGHS Rich Bin A/Abad | A.V.P |
| 372 | Mst. Rubina H/M BS-17 GGHS Dheri Katlang District Mardan | H/M BS-17 GGHS Shamshad Abad Mardan | A.V.P |
| 373 | Mst. Sadia Nazir SS (Stat) BS-17 GGHS Chamkani Peshawar working against BS-18 post (wrong posting) | SS (Stat) BS-17 GGHS Tarnab Form Peshawar | Vice S.No.252 |
| 374 | Mst. Fozia Irshad SS (Econ) BS-18 GGHS University Town Peshawar | SS (Econ) BS-18 GGHS Peshawar | Vice S.No.317 |
| 375 | Mst. Dilshad Bibi SS (Bio) BS-17 GGHS Behali Mansehra | SS (Bio) BS-17 GGHS Dhamtor A/Abad | Vice S.No.55 |
| 376 | Mst. Yasmin Akhtar H/M BS-17 GGHS Jambail Swat | H/M BS-17 GGHS Panr Swat | Vice S.No.50 |
| 377 | Mst. Dur-e-Shawar SS (Chem) BS-17 GGHS Ouch Dir Lower | SS (Chem) BS-17 GGHS Badwan Dir Lower | A.V.P |
| 378 | Mst. Sultana Safdar H/M BS-17 GGHS Ningolai Swat | H/M BS-17 GGHS Ghalegay Swat | Vice S.No.191 |

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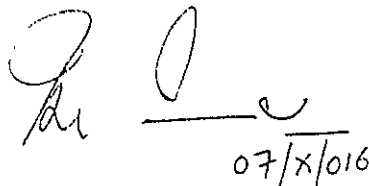
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SECRETARY

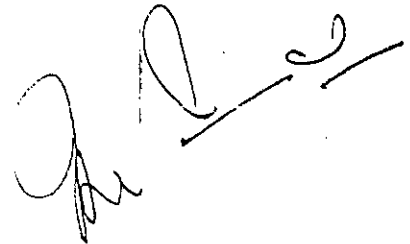
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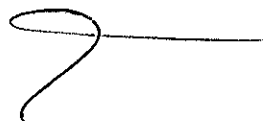
1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director Education (FATA) FATA Secretariat Warsak Road Peshawar.
4. Director DCTE Abbottabad.
5. Director PITE Khyber Pakhtunkhwa.
6. Director RITE (F) Khyber Pakhtunkhwa.
7. District Education Officers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


07/x/016

(LAL SAEED KHATTAK)
SECTION OFFICER (SCHOOLS/FEMALE)



ATTESTED



39



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the January 5th, 2018

NOTIFICATION

NO. SO(S/F)E&SED/4-16/2018/Placement Committee: Consequent upon the recommendations of Placement Committee, posting/ transfer in respect of following female officers from management/ teaching cadre in the Elementary & Secondary Education Department are hereby ordered against the posts noted against each in the interest of public service with immediate effect:

| S# | Name & Address | To be Posted as | Remarks |
|----|--|--|---|
| 1 | Mst. Sofia Tabassum (BS-18) Dy: DEO (F) Charsadda (Management Cadre) | DDEO (F) BS-18 Peshawar with additional charge of DEO (F) Peshawar | Vice Sr. No. 3 |
| 2 | Mst. Naghmana Sardar (BS-18) Dy: DEO (F) Swabi (Management Cadre) | DDEO (F) BS-18 Charsadda with additional charge of DEO (F) Charsadda | Vice Sr. No. 1 |
| 3 | Mst. Ulfat Begum (BS-18) Dy: DEO (F) Peshawar (Management Cadre) | DDEO (F) BS-18 Swabi with additional charge of DEO (F) Swabi | Vice Sr. No. 2 |
| 4 | Mst. Saadia Ilyas, Dy: DEO (F) Bunner (Teaching Cadre) | DDEO (F) Malakand with additional charge of DEO (F) Malakand | Vice Sr. No. 10 The charge of DEO (F) Bunner assigned to DE (M) Bunner |
| 5 | Mst. Nusrat Begum (BS-18) DEO (F) Dir Lower (Teaching Cadre) | Services placed at the disposal of Directorate of E&SE | The charge of DEO (F) Dir Lower assigned to DEO (M) Dir Lower |
| 6 | Mr. Shabir Hussain Shah (BS-18) DEO (Female) Kohistan (Teaching Cadre) | Services placed at the disposal of Directorate of E&SE | The charge of DEO (F) Kohistan assigned to DEO (M) Kohistan |

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| S# | Name & Address | To be Posted as | Remarks |
|----|---|--|------------------------------|
| 7 | Mst. Rehana Yasmin (BS-18) DDEO (F) Manshira (Management Cadre) | DDEO (F) BS-18 Battagram with additional charge of DEO (F) Battagram | Vice Sr. No. 8 |
| 8 | Mst. Zubaida Haneef (BS-18) DDEO (F) Battagram (Management Cadre) | DDEO (F) BS-18 Manshira with additional charge of DEO (F) Manshira | Vice Sr. No. 7 |
| 9 | Mst. Zuhra Begum (BS-18) Dy: Directress Directorate of E&SE (Management Cadre) | Principal (BS-19) GGHS Kalu Khan Swabi | A.V.P (in her own pay scale) |
| 10 | Mst. Dilshad Begum (BS-18) DDEO (Female) Malakand (Management Cadre) | Dy: Directress (BS-18) Directorate of E&SE | Vice Sr. No. 9 |
| 11 | Mst. Tahira Jabeen (BS-18) Principal GGHS Kholian Bala (Teaching Cadre) | DDEO (F) BS-18 Abbottabad | A.V.P |
| 12 | Mst. Rafia Naz Jadoon, SS (BS-17) GGHS Richbin Abbottabad (Teaching Cadre) | DDEO (F) BS-18 Haripur | A.V.P (in her own pay scale) |
| 13 | Mst. Sabana Yusrat, SS (H/Civics) BS-18 GGHS Begum Shahabuddin Peshawar (Teaching Cadre) | DDEO (F) BS-18 Peshawar | A.V.P |
| 14 | Mr. Abdur Rehman, HM (BS-17) GHS Para Gari Kohistan (Teaching Cadre) | DDEO (Female) BS-18 Kohistan | A.V.P (in his own pay scale) |
| 15 | Mst. Rana Atta Ullah, HM (BS-17) GGHS Ali Rustam Mardan (Teaching Cadre) | SDEO (Female) BS-17 Mardan | A.V.P |
| 16 | Mst. Nusrat Jabeen, SS (BS-17) GGHS Azakhel Nowshera (Teaching Cadre) | SDEO (Female) BS-17 Takhtbhai Mardan | A.V.P |
| 17 | Mst. Ruqia (BS-16) ASDEO (F) Khwazakhela working as SDEO (F) Khwazakhela (Teaching Cadre) | SDEO (F) BS-17 Behrin | A.V.P (in her own pay scale) |

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ATTACHED

[Handwritten Signature]

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| S# | Name & Address | To be Posted as | Remarks |
|----|--|--|--|
| 18 | Mst. Zakia Bibi (BS-16) ASDEO (F) Charbagh (Management Cadre) | SDEO (F) BS-17 Khwazakhela | Vice Sr. No. 17 (in her own pay & scale) |
| 19 | Mst. Bibi Aisha (BS-16) ASDEO (F) Shahpur (Management Cadre) | SDEO (F) BS-17 Alpuri Shangla | A.V.P (in her own pay & scale) |
| 20 | Mst. Fozia Sultana, HM (BS-17) working as SDEO (F) Jehangira Nowshera (Teaching Cadre) | HM (BS-17) GGHS Hisar Tang Nowshera | A.V.P |
| 21 | Syeda Nasra Azam (BS-16) ASDEO (F) Khairabad (Management Cadre) | SDEO (F) BS-17 Jehangira Nowshera | Vice Sr. No. 20 (in her own pay & scale) |
| 22 | Mr. Sher Bahader, SS (BS-17) GHSS Sherpur Manshara (Teaching Cadre) | SDEO (F) BS-17 Toorgher | A.V.P |
| 23 | Mst. Farhat Sultana, HM (BS-17) GGHS Reerh Manshara (Teaching Cadre) | SDEO (F) BS-17 Balakot Manshara | A.V.P |
| 24 | Mst. Nilofer Sakhawat (BS-16) ASDEO (F) Butial Circle Shangla (Teaching Cadre) | SDEO (F) BS-17 Besham | A.V.P (in her own pay & scale) |
| 25 | Mst. Waheeda Khan, SS (English) BS-17 services placed at the disposal of Directorate of E&SE (Teaching Cadre) | SDEO (F) BS-17 Pabbi Nowshera | A.V.P |
| 26 | Mst. Faheem Afshan (BS-16) ASDEO working as SDEO (F) Pabbi | ASDEO (F) BS-16 Jehangira Nowshera | A.V.P |
| 27 | Mst. Ifiat Younas, SDEO (F) Ghazi Haripur | SDEO (F) Khanpur Haripur | A.V.P |

2. No TA/DA allowed.

3. The above order will be effective subject to the condition that the officers posted in their own pay & scale will give an undertaking/ Affidavit on legal/ stamp paper to Secretary

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ATTESTED

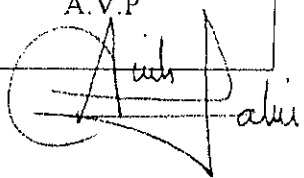
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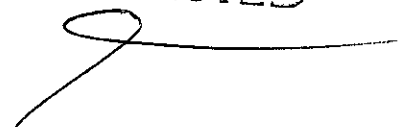
| | Name & Address | To be Posted as | Remarks |
|----|--|--|---|
| 18 | Mst. Zakia Bibi (BS-16) ASDEO (F) Charbagh (Management Cadre) | SDEO (F) BS-17 Khawazakhela | Vice Sr. No. 17 (in her own pay & scale) |
| 19 | Mst. Bibi Aisha (BS-16) ASDEO (F) Shahpur (Management Cadre) | SDEO (F) BS-17 Alpuri Shangla | A.V.P (in her own pay & scale) |
| 20 | Mst. Fozia Sultana, HM (BS-17) working as SDEO (F) Jehangira Nowshera (Teaching Cadre) | HM (BS-17) GGHS Hisar Tang Nowshera | A.V.P |
| 21 | Syeda Nasra Azam (BS-16) ASDEO (F) Khairabad (Management Cadre) | SDEO (F) BS-17 Jehangira Nowshera | Vice Sr. No. 20 (in her own pay & scale) |
| 22 | Mr. Sher Bahader, SS (BS-17) GHSS Sherpur Mansehra (Teaching Cadre) | SDEO (F) BS-17 Toorgher | A.V.P |
| 23 | Mst. Farhat Sultana, HM (BS-17) GGHS Reerh Mansehra (Teaching Cadre) | SDEO (F) BS-17 Balakot Mansehra | A.V.P |
| 24 | Mst. Nilofer Sakhawat (BS-16) ASDEO (F) Butial Circle Shangla (Teaching Cadre) | SDEO (F) BS-17 Besham | A.V.P (in her own pay & scale) |
| 25 | Mst. Waheeda Khan, SS (English) BS-17 services placed at the disposal of Directorate of E&SE (Teaching Cadre) | SDEO (F) BS-17 Pabbi Nowshera | A.V.P |
| 26 | Mst. Faheem Afshan (BS-16) ASDEO working as SDEO (F) Pabbi | ASDEO (F) BS-16 Jehangira Nowshera | A.V.P |
| 27 | Mst. Iffat Younas, SDEO (F) Ghazi Haripur | SDEO (F) Khanpur Haripur | A.V.P |

2. No TA/DA allowed.

3. The above order will be effective subject to the condition that the officers posted in their own pay & scale will give an undertaking/ Affidavit on legal/ stamp paper to Secretary

A.V.P


ATTESTED



43

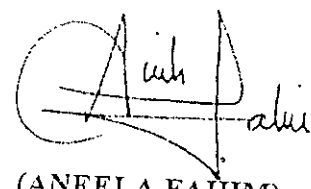
E&SED/ Directorate of E&SE Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

Endst: of even No. & date:

SECRETARY

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director DCTE, Khyber Pakhtunkhwa, Abbottabad.
4. District Education Officers (Female) concerned.
5. District Accounts Officers concerned.
6. In-charge EMIS, E&SE Department for uploading at official website.
7. PS to Secretary E&SE Department, Peshawar.
8. Officers concerned.
9. Office order file.



(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS FEMALE)



144

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated Peshawar the, May 30th, 2011

NOTIFICATION

NO.SO(S/F)E&SED/3-2/2011/DO(F): Consequent upon the recommendations of Khyber Pakhtunkhwa Public Service Commission Peshawar, the Competent Authority is pleased to appoint the following candidates against the post of District Officers/Deputy Directors (Female) BS-18 (Rs.12910-930-31510) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in the Management Cadre in Elementary & Secondary Education Department on the terms and conditions given below with immediate effect:-

| S.No. | Name & Father's Name | Domicile |
|-------|--|----------------|
| 1 | Mst. Arjumand Jamshed d/o Jamshed Khan Khattak | Karak |
| 2 | Mst. Asmat Ara d/o Muhammad Bashir | Bannu |
| 3 | Mst. Bibi Rizwana d/o Sikandar Khan | Kurram Agency |
| 4 | Mst. Dilshad Begum d/o Muhammad | Swat |
| 5 | Mst. Farzana Begum d/o Sardar Khan | Kohat |
| 6 | Mst. Perveen Begum d/o Gul Daraz Khan | Karak |
| 7 | Mst. Rabia Anees d/o Abdul Aziz (Late) | Peshawar |
| 8 | Mst. Sabira Parveen d/o Qazi Abdur Rauf | D.I.Khan |
| 9 | Mst. Samina Ghani d/o Sher Ghani | Peshawar |
| 10 | Mst. Shafqat Rehman d/o Fazal Rehman | Swabi |
| 11 | Mst. Sofia Tabbasum d/o Noor ul Islam | Peshawar |
| 12 | Mst. Ulfat Begum d/o Kifayatullah | Charsadda |
| 13 | Mst. Zuhra Begum d/o Sadullah | Mohmand Agency |
| 14 | Mst. Abida Shaheen d/o Zahir ud Din | Abbottabad |
| 15 | Mst. Surraya Begum d/o Amanullah Khan | Karak |
| 16 | Mst. Bibi Razia d/o Gulistan Khan | Karak |
| 17 | Mst. Shamim Akhtar d/o Rehman Gul | Peshawar |
| 18 | Mst. Zubaida Hanif d/o Muhammad Hanif | Karak |
| 19 | Mst. Rehana Yasmin d/o Abdul Rehman Abbasi | Haripur |
| 20 | Mst. Naheed Anjum d/o Shah Jehan | Nowshera |
| 21 | Mst. Zaibun Nisa d/o Mir Salam Khan | Karak |

2- Consequent upon the above, the following postings/transfers are hereby ordered, henceforth

| | Name/Father's Name & Address | Domicile | Proposed place of posting | Remarks |
|---|--|---------------|---------------------------|---------------------|
| 1 | Mst. Arjumand Jamshed d/o Jamshed Khan Khattak House No.211 Sec.F-4 St.5 Ph.6 Hayatabad Peshawar | Karak | DO(Female) BS-18 Shangla | Against vacant post |
| 2 | Mst. Asmat Ara Qureshi d/o Muhammad Bashir House No.640 Sec.D-4 St-31 Ph-I Hayatabad Peshawar | Bannu | DO (Female) BS-18 Bannu | Vice S.No.23 |
| 3 | Mst. Bibi Rizwana d/o Sikandar Khan Atlas Public School Garhi Risaldar Dhooda Road Kohat | Kurram Agency | DO (Female) BS-18 Hangu | Against Vacant Post |

ATTESTED

Attested
Splishur
Deputy District Officer
(Female) Primary Mar

| | | | | |
|----|---|----------------|-----------------------------------|---------------------|
| | Mst. Dilshad Begum d/o Muhammad Assistant District Officer(F) E&S Education Department Swat-Bungalow No.B-23 Near Ladies Park College Colony Said Sharif Swat | Swat | DO (Female) BS-18 Swat | Against Vacant Post |
| | Mst. Farzana Begum d/o Sardar Khan Behzadi Chakar Kot Muhallah Allah Dadi Kohat | Kohat | DO (Female) BS-18 Kohat | Against Vacant Post |
| 6 | Mst. Perveen Begum d/o Gul Daraz Khan Village & P.O Khujaki Killa Teh.Takhte Nasrati District Karak | Karak | DO(Female) BS-18 Lakki Marwat | Against Vacant Post |
| 7 | Mst. Rabia Anees d/o Abdul Aziz (Late) GGHSS Begum Shahabuddin Peshawar | Peshawar | DO (Female) BS-18 Peshawar | Vice S.No.27. |
| 8 | Mst. Sabira Parveen d/o Qazi Abdur Rauf C/O Khalid Tanveer DPE Mohallah Bhora Shah D.I.Khan | D.I.Khan | DO (Female) BS-18 D.I.Khan | Vice S.No.25 |
| 9 | Mst. Samina Ghani d/o Sher Ghani H.No.119 St.5 Sector L-3 Phase-III Hayatabad Peshawar | Peshawar | DO(Female) BS-18 Malakand | Against Vacant Post |
| 10 | Mst. Shafqat Rehman d/o Fazal Rehman NEAS H-9 Islamabad- House No.328 Nowshera Cantt | Swabi | DO (Female) BS-18 Swabi | Vice S.No.25 |
| 11 | Mst. Sofia Tabbasum d/o Noor ul Islam House No.232 St.9 Sector F-8 Phase-6 Hayatabad Peshawar | Peshawar | DO(Female) BS-18 Mardan | Vice S.No.28 |
| 12 | Mst. Ulfat Begum d/o Kifayatullah Moh.Bomboo Khail Village & P.O. Turangzai Teh. & Distirct Charsadda | Charsadda | DO(Female) BS-18 Charsadda | Vice S.No.24 |
| 13 | Mst. Zuhra Begum d/o Sadullah, House No.206 Street No.5 Sector C-1 Phase-5 Hayatabad Peshawar | Mohmand Agency | Deputy Director, E&SE Directorate | Vice S.No.29 |
| 14 | Mst. Abida Shaheen d/o Zahir ud Din House No.246 Mohallah Jammal Din Police Line Lane Malik Pura Abbottabad. | Abbottabad | DO(Female) BS-18 Abbottabad | Vice S.No.22 |
| 15 | Mst. Surraya Begum d/o Amanullah Khan C/O Abbas Khan Khattak, Govt. College Peshawar | Karak | DO(Female) BS-18 Buner | Against Vacant Post |
| 16 | Mst. Bibi Razia d/o Gulistan Khan, Village Topi Kalla P.O. Bogara Tehsil Takhte Nasrati District Karak | Karak | DO(Female) BS-18 Karak | Against Vacant Post |
| 17 | Mst. Shamim Akhtar d/o Rehman Gul, Behari Colony P/O Tehkal Payan Warsak Road, Peshawar | Peshawar | DO(Female) BS-18 Dir Upper | Against Vacant Post |
| 18 | Mst. Zubaida Hanif d/o Muhammad Hanif Khan, Tehsil Takhte Nasrati Mohallah Chachahail District Karak | Karak | DO(Female) BS-18 Batagram | Against Vacant Post |
| 19 | Mst. Rehana Yasmin d/o Abdul Rehman Abbasi, House No.816 Street No.8 Phase-1 TIP Housing Colony Haripur | Haripur | DO (Female) BS-18 Haripur | Vice S.No.26 |
| 20 | Mst. Naheed Anjum d/o Shah Jehan C/O Mr. Abdul Wahab House No.15 Rehman Baba Colony Nowshera Cantt. | Nowshera | DO(Female) BS-18 Nowshera | Against Vacant Post |
| 21 | Mst. Zaibun Nisa d/o Mir Salam Khan House No.237, Sector P-2 Street-4 Phase-4 Hayatabad Peshawar | Karak | DO(Female) BS-18 Dir Lower | Against Vacant Post |

(Signature)
 Deputy District Officer
 Peshawar

Consequential Postings/Transfers

| | | | | |
|----|---|------------|---|---------------------|
| 22 | Ms. Nusrat Shaheen Principal (BS-18) presently posted as DO(F) Abbottabad | Abbottabad | Instructor (BS-18) RITE (F) Abbottabad | Against Vacant post |
| 23 | Ms. Nughmana Niamat, Principal (BS-18) presently working as DO(F) Bannu | Bannu | Principsi (BS-18) GGHSS Koti Saadat Bannu | Against Vacant post |
| 24 | Ms. Waheeda Ayaz, Principal (BS-18) Presently posted as DO (F) | Peshawar | Principal (BS-18) GGHSS Harichand Charsadda | Against Vacant post |

(Signature)

| | | | | |
|----|--|----------|--|---|
| | Ms. Farzana Javed Headmistress (BS-17) presently posted as DO(F) Swabi | Swabi | Headmistress (BS-17) GGHS Dubian Swabi | Against Vacant post |
| 5 | Ms. Rukhsana Zia Principal (BS-18) presently posted as DO(F) Haripur | Haripur | Principal (BS-18) GGHS Ghazi Haripur | Against Vacant post |
| 27 | Ms. Rubina Shaheen Principal (BS-18) presently working as DO(F) Peshawar | D.I.Khan | Services placed at the disposal of Directorate E&SE | ----- |
| 28 | Miss Naheed Khan SET presently working as DO (F) Mardan | Mardan | Services placed at the disposal of Directorate E&SE Peshawar | ----- |
| 29 | Ms. Ruqia Khanum Principal (BS-18) presently working as Deputy Director (Estt) E&SE Peshawar | Peshawar | Instructor (BS-18) RITE Female Dabgari Peshawar | To be vacated by Mst. Khalida on her regular promotion to BS-19 |

TERMS & CONDITIONS:

1. Their services will be considered regular but without Pension & Gratuity in terms of Section-19 of the NWFP Civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to Contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
2. The Officers who are already in Government service and working against pensionable posts on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through proper channel and selection by the Commission are appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to them under their previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to them under new appointment.
3. Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances, shall be forfeited to the Government.
4. The appointees should join their posts within 30 days of the issuance of this notification. The Director, E&SE Peshawar would furnish a certificate to the effect that the candidates have joined the posts otherwise after one month of the issuance of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
5. They would be on probation for a period of one year extendable for another one year as provided in NWFP Appointment Promotion and Transfer Rules 1989.
6. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
7. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the NWFP Removal from Service (Special Powers) Ordinance, 2000 and the Rules framed from time to time.
8. Charge report should be submitted to all concerned.
9. No TA/DA will be allowed to the appointees for joining their duty.

ATTESTED

SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Attested
S. Nishan
Deputy District Officer
(Female) Peshawar

47



Serial Number & Date:

Copy forwarded for information & necessary action to:

- 1. PSO to Chief Minister, Khyber Pakhtunkhwa.
- 2. Accountant General, Khyber Pakhtunkhwa.
- 2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
- 3. Director Curriculum & Teacher Education Abbottabad.
- 4. EDOs, E&SE Concerned.
- 5. District Accounts Officers Concerned.
- 6. Director Recruitment, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
- 7. PS to Minister for Education, Khyber Pakhtunkhwa.
- 8. PS to Chief Secretary, Khyber Pakhtunkhwa.
- 9. PS to Secretary, E&SE Department
- 10. PA to Additional Secretary, E & SE Department.
- 11. PA to Deputy Secretary, E & SE Department.
- 12. Officers Concerned
- 13. Office order file

M. Nishtar
M. Nishtar
 Deputy District Officer
 (Female) Mardan

(AASMA ARIF)
 SECTION OFFICER (SCHOOLS/FEMALE)

ATTESTED

To:

The worthy Secretary E&SE Department
Khyber pakhtun khwa peshawar.

Subject : **APPEAL FOR AWARDED SENIORITY FOR PROMOTION FROM THE DATE OF JOINING OF SERVICE IN EDUCATION DEPARTMENT.**

Respected Sir,

I very humbly submitted my Appeal as under:

(1) My name is Miss Ulfat Begum joined Education department as (SST BPS- 16) w-e-f 1987 and after more or less one decade in (1997) joined Head mistress post (BPS-17) Through public service commission, thereafter in (2011) I was appointed through public service commission as District Education officer (F) (BPS-18) in (Management cadre) and remained District Education officer in various Districts, presently Performing duty as a District Education officer female Charsadda since 08-03-12018. **(Copy of Appointment orders Appended)**

(2) That the Applicant has more or less (30) years Service with good record through out at my credit

(3) That the department has never observed teaching cadre seniority of the Applicant, rather the department observed all cadre seniority of the (1) Mr Rafiq khattak Ex-Director E&SE KPK (Management cadre) (2) Hafiz Ibrahim DEO (Management Cadre) (3) Gauhar Ali (Management Cadre) thus the promotion order issued by the department of the aforementioned officers having same question of facts, hence the applicant also deserves the same treatment under the principle of consistency being similarly placed issue.

(4) That the department promoted/upgraded the most junior officers of teaching cadre who were junior from the Applicant, the promotion order issued by the department of the most junior person is highly discriminatory. **(Copy Appended)**

(5) That the applicant has been kept deprived from her legal right of promotion/upgradation which is not tenable under the norms of justice.

ATTESTED

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It is therefore humbly prayed accept my request and treat alike of the
aforementioned officers and may also be awarded all seniority in
favor of the Applicant.

Yours sincerely,



(MISS ULFAT BEGUM)
DEO Female Charsadda.

Dated: ___/___/2018.

Copy for information

- (1) Director E&SE department kpk
- (2) Personal file

ATTESTED



807
Approved - IF

GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

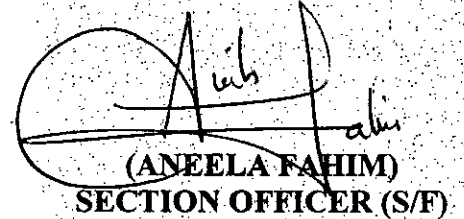
No. SO(S/F)E&SED/4-17/2017/Mst. Ulfat Begum/Peshawar
Dated Peshawar the September 17th, 2018

To

18/9/18
Mst. Ulfat Begum,
District Education Officer (Female),
Charsadda.

SUBJECT: APPEAL FOR AWARD OF SENIORITY FOR PROMOTION FROM THE DATE OF JOINING OF SERVICE IN EDUCATION DEPARTMENT

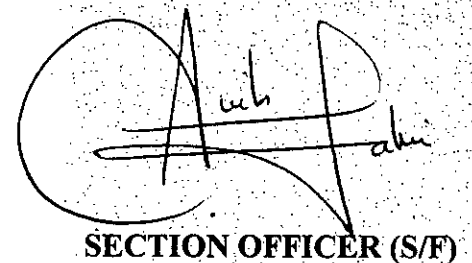
I am directed to refer to your appeal on the subject noted above and to intimate that the subject appeal is not tenable under the Management Cadre Rules dated 03-07-2018, and therefore, regretted.


(ANEELA FAHIM)
SECTION OFFICER (S/F)

Endst: of even No. & Date:

Copy forwarded to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary, E&SE Department.


SECTION OFFICER (S/F)

ATTESTED



51

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT**

SUMMARY FOR CHIEF MINISTER KHYBER PAKHTUNKHWA

SUBJECT: RECRUITMENT OF (26) EXECUTIVE DISTRICT OFFICERS / ADDITIONAL DIRECTORS (BPS-19) IN THE MANAGEMENT CADRE OF THE ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

The Establishment of Management cadre by the Government of Khyber Pakhtunkhwa is in line with National Education Policy 2009 which envisages that Management Cadre for Education, with specified training and qualification requirements shall be introduced.

2. In pursuance to the above policy, the E&SE Department notified the Management Cadre vide Notification dated 4.5.2009 (F/A) and made a requisition to the Khyber Pakhtunkhwa Public Service Commission for recommendation against various positions of Management Cadre.

3.. In response to the said requisition, the Khyber Pakhtunkhwa Public Service Commission has recommended the following twenty Six (26) candidates for recruitment to the posts of Executive District Officers/Additional Directors (B-19) in the Management Cadre of the Elementary and Secondary Education Department (F/B):-

a) **CATEGORY A (OPEN MARKET)**

| Merit Order | Name with Father's Name | District / Zone | D/O Birth |
|-------------|--|-----------------|-----------|
| 1. | Ghulam Qasim Khan S/O Abdul Majeed Khan | D.I Khan / 4 | 10-01-56 |
| 2. | Abdul Malik S/O Muhammad Mushtaq | D.I Khan / 4 | 07-01-54 |
| 3. | Umar Khan S/O Muhammad Hassan | Tank / 4 | 12-02-62 |
| 4. | Shamas Khan S/O Mir Ahmad Khan | Gadoon / 3 | 13-02-54 |
| 5. | Abdus Salam S/O Hameed Ullah Jan | D.I Khan / 4 | 01-04-62 |
| 6. | Abdul Basit S/O Qavi Ullah | Peshawar / 2 | 26-06-73 |
| 7. | Siraj Mohammed S/O Muhammad Khan | Peshawar / 2 | 20-01-60 |
| 8. | Muhammad Uzair Ali S/O Abdul Qayyum | Swabi / 2 | 08-01-66 |
| 9. | Nazir Khan S/O Gul Piao Khan | Karak / 4 | 06-03-59 |
| 10. | Sahibzada Hamid Mahmud S/O Mahmud-Ul-Hassan Akhtar | Peshawar / 2 | 06-09-65 |

b) **CATEGORY B (TEACHING CADRE)**

| Merit Order | Name with Father's Name | District / Zone | D/O Birth |
|-------------|--|------------------|-----------|
| 1. | Bashir Hussain Shah S/O Taj Hussain Shah | Haripur / 5 | 10-01-57 |
| 2. | Muhammad Rafique S/O Niaz Khamim | Karak / 4 | 14-02-58 |
| 3. | Feroz Hussain Shah S/O Sultan Ali Shah | D.I Khan / 4 | 25-10-54 |
| 4. | Abdur Rashid S/O Ghulam Jaffar | D.I Khan / 4 | 15-05-57 |
| 5. | Muhammad Ibrahim S/O Buzarg Jamher | Dir Lower / 3 | 16-03-63 |
| 6. | Sultan Mahmood Mian S/O Mumtaz | Swat / 3 | 21-12-55 |
| 7. | Roz Wali Khan S/O Jannat Noor | Karak / 4 | 10-04-57 |
| 8. | Abdullah S/O Mir Azam | Malakand Agy/3 | 20-09-56 |
| 9. | Muhammad Riaz S/O Ghulam Khan | Manshehra / 5 | 02-05-60 |
| 10. | Jehan Muhammad S/O Sultan Muhammad | Nowshera / 2 | 04-01-61 |
| 11. | Muhammad Shaukat S/O Abdul Jalil | Manshehra / 5 | 15-10-62 |
| 12. | Gohar Ali Khan S/O Muhammad Ali Khan | Peshawar / 2 | 01-01-67 |
| 13. | Haziq-ur-Rahman S/O Saqwar Jan | Karak / 4 | 06-02-62 |
| 14. | Jaffar Mansoor Abbasi S/O Gauhar Rahman Abbasi | Abbottabad / 5 | 15-09-68 |
| 15. | Zia-ud-Din S/O Ghulam Mohiy-ud-Din | Lakki Marwat / 4 | 01-09-70 |
| 16. | Muhammad Nisar S/O Muhammad Nisar Khan | Lakki Marwat / 4 | 18-03-60 |

ATTENDED

4. Recommendations in favour of the aforementioned candidates were provisional and subject to the passing of a prescribed medical test and satisfaction of Khyber Pakhtunkhwa Public Service Commission about their PERs. They were accordingly referred to the Standing Medical Board for medical examination and to the D.I.G. Police (Special Branch) Khyber Pakhtunkhwa, Peshawar for verification of their antecedents. The Standing Medical Board has declared them medically fit for Government service (F/C). The Khyber Pakhtunkhwa Public Service Commission after perusal of PERs has also confirmed their recommendations (F/D). However, clearance of their antecedents from the Special Branch Police is still awaited. Nonetheless their orders will be issued on receipt of their antecedents verified from the DIG Police Special Branch Khyber Pakhtunkhwa. Moreover, all these recommendees are regular Government servants and are within the prescribed age limit under age relaxation policy of the Provincial Government.

5. It is also pertinent to state that PSC vide their letter dated 10-12-2010 (F/E) intimated that Ms. Samina Altaf filed a writ petition in the Peshawar High Court Abbottabad Bench, and requested that the original application forms along with all the relevant documents be sent to them (PSC) in respect of the following candidates as the Court has sought comments in the instant case. The Peshawar High Court has suspended the recommendations of these candidates subject to notice (F/F):-

1. Mr. Abdul Basit S/O Qavi Ullah
2. Muhammad Shaukat S/O Abdul Jalil
3. Mr. Jaffar Mansoor Abbasi S/O Gauhar Rahman Abbasi

6. In view of above, it is proposed that appointment and posting of the following recommendees may be approved so that notification in this regard could be issued accordingly except M/s Abdul Basit S/o Qavi Ullah, Muhammad Shaukat S/o Abdul Jalil, Jaffar Mansoor Abbasi S/o Gohar Rahman Abbasi as indicated in para-5 of the summary and their appointment may be kept pending till decision of the Court. The services of the existing incumbent EDOs (Teaching Cadre) will be placed at the disposal of Directorate of E&SE for further posting.

Proposal for posting /adjustment:-

| S# | NAME OF RECOMMENDEES | PROPOSED PLACE OF POSTING | REMARKS |
|-----|--|---|-------------------------|
| 1. | Ghulam Qasim Khan S/O Abdul Majeed Khan | EDO (E&SE) Tank | |
| 2. | Abdul Malik S/O Muhammad Mushtaq | EDO (E&SE) Lakki Marwat. | |
| 3. | Shamas Khan S/O Mir Ahmad Khan | EDO (E&SE) Buner. | |
| 4. | Abdus Salam S/O Hameed Ullah Jan | EDO (E&SE) Swabi. | already occupied by him |
| 5. | Muhammad Ibrahim S/O Buzerg Jamher | EDO (E&SE) Dir Lower. | already occupied by him |
| 6. | Muhammad Uzair Ali S/O Abdul Qayyum | EDO (E&SE) Mardan | |
| 7. | Nazir Khan S/O Gul Piao Khan | EDO (E&SE) Kohat. | |
| 8. | Bashir Hussain Shah S/O Taj Hussain Shah | Addl. Director P&D, Directorate of F&SE | already occupied by him |
| 9. | Muhammad Rafique S O Niaz Khamim | Addl. Director Establishment Directorate of E&SE. | |
| 10. | Feroz Hussain Shah S O Sultan Ali Shah | EDO (E&SE) Shangha. | |
| 11. | Abdur Rashid S O Ghulam Jaffar | EDO (E&SE) Bannu. | |
| 12. | Sultan Mahmood Mian S/O Mumtaz | EDO (E&SE) Swat. | |
| 13. | Roz Wali Khan S/O Jannat Noor | EDO (E&SE) Nowshera. | already occupied by him |
| 14. | Abdullah S/O Mir Azam | EDO (E&SE) D.I. Khan. | |
| 15. | Muhammad Riaz S/O Ghulam Khan | EDO (E&SE) Mianchana. | |

APPROVED

53

| S. # | NAME OF RECOMMENDEES | PROPOSED PLACE OF POSTING | REMARKS |
|------|--|---|---------|
| 16. | Jehan Muhammad S/O Sultan Muhammad | EDO (E&SE) Charsadda. <i>Handwritten note</i> | |
| 17. | Gohar Ali Khan S/O Muhammad Ali Khan | EDO (E&SE) Peshawar. | |
| 18. | Haziq-ur-Rahman S/O Sarwar Jan | EDO (E&SE) Karak. | |
| 19. | Atta Ullah Khan S/O Muhammad Nawaz Khan | EDO (E&SE) Hangu. <i>Handwritten note</i> | |
| 20. | Umar Khan S/O Muhammad Hassan | EDO (E&SE) Haripur. <i>Handwritten note</i> | |
| 21. | Siraj Muhammad S/O Muhammad Khan | EDO (E&SE) Chitral. | |
| 22. | Sahibzada Hamid Mehmood S/O Mehmood-ul-Hassan Akhtar | EDO (E&SE) Abbottabad. | |
| 23. | Zia-ud-Din S.O Ghulam Mohiy-ud-Din | EDO (E&SE) Dir Upper | |

7. Fresh candidates, on selection by the Khyber Pakhtunkhwa Public Service Commission will be appointed on regular basis but without Pension and Gratuity. However, the candidates who are already in Government service and working against pensionable posts on regular basis before 1st day of July, 2001 without any service break, on application to Khyber Pakhtunkhwa Public Service Commission through Proper Channel and selection by the Commission on appointment are allowed to exercise option either to retain benefit of pension & gratuity as allowed to them under their previous terms of appointment or to avail the benefit of Contributory Provident Fund allowed to them under new appointment in terms of amendment made in Section 19 of NWFP Civil Servants Act, 1973 on 28-03-2009 (F/G).

8. The Chief Minister, Khyber Pakhtunkhwa being appointing Authority in terms of rule-4 of NWFP Civil Servants (Appointment Promotion and Transfer) Rules 1989 is requested to kindly approve the proposal contained in para-6 read with para-7 of the summary.

Minister for Edu.(E&SE)
Khyber Pakhtunkhwa

Chief Secretary,
Khyber Pakhtunkhwa

(Signature)
(MUHAMMAD ARIFEEN)
Secretary to Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Education
Department *04*

MINISTER for Elementary &
Secondary Education
Khyber Pakhtunkhwa

9.

Please examine.

Secy Estb

ATTESTED

(Signature)

7.2.2011

Chief Secretary

Next page

POWER OF ATTORNEY

In the Court of IC PIC Sogree Toiburni Peshawar
Ul Fud Begum

} For
} Plaintiff
} Appellant
} Petitioner
} Complainant

VERSUS

Govt of IC PIC and others

} Defendant
} Respondent
} Accused
}

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____
Fixed for _____

I/W, the undersigned, do hereby nominate and appoint

ZARTAJ ANWAR ADVOCATE, my true and lawful attorney, for me in my same and on my behalf to appear at Ro to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromise or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or sub-poena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at _____
the _____ day to _____ the year _____
Executant/Executants _____
Accepted subject to the terms regarding fee _____

Aliyan
Aliyan
Mulla 30/06/2017

Zartaj Anwar
Zartaj Anwar
Advocate High Courts

ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR-3-4, Fourth Floor, Bilour Plaza, Saddar Road, Peshawar Cantt
Ph.091-5272154 Mobile-0331-9399185

Before the Hon'able Service Tribunal Khyber Pakhtunkhwa, Peshawar

Service Appeal No.1293/2018

Ulfat Begum, District Education Officer (Female), Peshawar.....Appellant

Versus

Government of Khyber Pakhtunkhwa through Secretary E&SE Department and others

Respondents

Joint para-wise comments on and for behalf of the Respondents 1 – 3.

Respectfully Sheweth

The respondents submit as under:-

Preliminary Objections:-

1. That the appellant is not entitled for the grant of seniority from the initial date of appointment as SST(F) post in the Respondent Department.
2. That the Respondent Department maintains separate seniority of both the teaching as well as management cadre.
3. That the appellant is working against the post of Deputy Director (Management Cadre) in BPS-18 in the Respondent Department instead of Teaching Cadre.
4. That the seniority of the appellant has been maintained on the basis of her inter-se-seniority determined by the Khyber Pakhtunkhwa Public Service Commission on the basis of the appellant academic and professional qualification.
5. That the impugned order and notification dated 17.09.2018 is legally competent under the Rules of Management dated 03.07.2018.

ON FACTS:

1. That Para-1 is correct that the appellant has joined the Respondent Department against the SST (F) Post in the year 1987 and later on promoted to the Headmistress post in BPS-17 in 1997. She was allowed graded pay in the DPC Meeting held on 09-12-1989 and then Selection Grade in BPS-17 vide Notification dated 17-04-2000 falling at serial No.91/38 by the Competent Authority (copies of both the Orders are attached as Annexures A & B).
2. That Para-2 is correct to the extent that the Government of Khyber Pakhtunkhwa has introduced and even separated the Teaching and Management Cadres in the year 2011 and has sought applications through the Khyber Pakhtunkhwa Public Service Commission whom the appellant has not made as a Respondent in the instant case on malafide intentions. The appellant while serving the Respondent Department against the Headmistress in BPS-17 Post (Teaching Cadre) has also applied for the Deputy District Education Post in BPS-18 and has recommended by the Khyber Pakhtunkhwa Public Service Commission and adjusted against the DEO(Female) Post on acting /stop gap arrangement basis by the Respondent against which the appellant is still serving in her original scale in BPS-18 (Management Cadre) having separate Inter-se-seniority number 13 in the final seniority list pertains to the Female Officers (Management Cadre) BPS-18 as stood on 31-12-2017 (Copy of the said seniority list attached as Annexures-C).
3. That Para 3 needs no comments, as such and every civil servant falling under the ambit of Section 2(b) of the above said Act of 1973 is legally and morally bound to perform her officials with her utmost sincerity and devotion.
4. That Para-04 is also incorrect and denied on the grounds that the Respondent Department has adopted separate seniority list pertaining to the Management and Teaching Cadre as evident from the Final Seniority List pertaining to the Officers of Management Cadre in BPS-18. Therefore, the stand of the appellant is liable to be rejected.

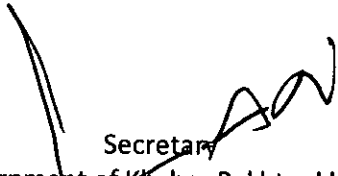
5. That Para-5 is incorrect and denied. The seniority of the Management Cadre of the female officers of Elementary and Secondary Education Department (Management Cadre) has been maintained on the basis of their respective inter-se-seniority hence the plea of the appellant is baseless and liable to be rejected.
6. That Para-6 is incorrect and misleading on the grounds that the appellant was inducted in the Respondent Department as SST/SET and promoted / recommended for the Headmistress in BPS-17 Post. However, in the year 2011, she applied for the DDEO(F) BPS-18 Post to the Khyber Pakhtunkhwa Public Service Commission and was selected against a BPS-18 Management Cadre post in the Respondent Department wherein she has been placed at seniority list Number 13 alongwith her batch-mates. Therefore, the claim of the appellant for the grant of seniority with effect from her 1st appointment as SET/SST in 1987 is baseless and even against the Management Cadre Rules dated 03.07.2018 of the Respondent Department, hence the claim of the appellant is liable to be rejected.
7. That Para-7 is incorrect and denied. The act of the Respondent Department to the extent of separation of seniority of Teaching and Management Cadre is within legal sphere as well as in accordance with the Management Rules dated 03.07.2018 of the Respondent Department, having no question of pick and choose or discrimination towards the appellant by the Respondent Department. Hence, the claim of the appellant is liable to be rejected.
8. That Para-8 is correct that a writ petition No.4265/2018 under the said titled case has been dismissed by the Honorable Peshawar High Court, Peshawar vide Order dated 18-09-2018 under the Mandatory Provision of Article 212 of the Constitution of Islamic Republic of Pakistan 1973. **(Copy of the Order dated 18.9.2018 is attached as Annexure-D).**
9. That para-9 is incorrect and denied. The Departmental Appeal of the appellant has been rejected by the competent authority vide Order dated 17.9.2018 under the provision of Management Cadre Rules dated 03.07.2018. On merits of the case as a civil servant, cannot be placed in two different cadres at the same time. Therefore, she has been placed at S.No.13 of the said Final Seniority pertaining to the Management Cadre under the provision of Section 8 of Civil Servant Act, 1973.
10. That Para-10 is also incorrect and denied. The order dated 17.09.2018 is legally competent. Hence, the appeal in hand is liable to be rejected on the **following grounds** inter alia:-

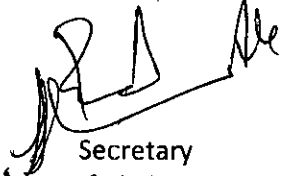
GROUND:

- a. Incorrect and not admitted. The appellant has been treated as per law, rules and relevant policy by the Respondent Department in the instant case. Hence, the claim of the appellant is without, the claim of the appellant is without any cogent prayer of justification and liable to be rejected by this Hon'able Service Tribunal.
- b. Incorrect and not admitted. The statement of the appellant is baseless and liable to be dismissed as the as the act of the Respondent Department with regard to the grant of seniority number 13 is the final seniority list pertaining to the officers of Management Cadre BPS-18. As the appellant has been treated with her batch matches of the said cadre under the provision of Section 8 of Civil Servant Act 1973 by the Respondents.
- c. Incorrect and not admitted. The plea of the appellant is without any solid ground and legal justification having no aspect of favoritism nepotism and political interference on the part of the Respondent Department.
- d. Incorrect and not admitted. The Respondent Department has maintained the seniority of the appellant in Management Cadre upon her recommendation from the Khyber Pakhtunkhwa Public Service Commission against the DDEO(F) post in BPS-18 whereas rest of the para is misleading and liable to be rejected in favour of the Respondents.
- e. Incorrect and not admitted. The appellant shall be promoted to higher scale upon her seniority and fitness basis on her own turn in the Management Cadre wherein she has been placed at Seniority No.13 in view of her inter-se-seniority preferred by the KP PSC whom the appellant has not made as a Respondent in the instant case on malafide intentions just for avoid bringing the factual position against the appellant.
- f. Incorrect and not admitted. The plea of the appellant is illegal as the act of the Respondent Department is in accordance with the relevant rules and provision of law.

- g. Incorrect and not admitted. The appellant has been treated as per law and rules and criteria in the instant case having no question of violation of mandatory provisions of Articles 37 & 38 of the Constitution of the Islamic Republic of Pakistan 1973 by the Respondent Department.
- h. Incorrect and not admitted. The appellant cannot be promoted out of turn and without criteria in the Respondent Department. Therefore, the plea of the appellant is baseless and liable to be rejected.
- i. Incorrect and not admitted. The appellant has been treated as per law, rules and criteria as well as in accordance with the mandate of Article 25 of the Constitution of Islamic Republic of Pakistan 1973 by the Respondent Department.
- j. Incorrect and not admitted. The statement of the appellant is without any cogent reason and justification and liable to be rejected.
- k. Incorrect and not admitted. Each and every civil servant is liable to serve his parent Department with full zeal and zest for which she is drawing salaries and other allied financial facilities from the Respondent Department.
- l. Incorrect and not admitted. The cited judgments of the August Supreme Court of Pakistan is not applicable upon the case of the appellant of being deficient on both question of law and facts of the case. Therefore, plea of the appellant is illegal and liable to be rejected.
- m. Legal. However, the Respondent also seek leave of this Hon'able Court/ Tribunal to submit additional grounds in the instant case, law and record at the time of adjournment on the date fixed before this Hon'able Bench.

Therefore, in view of the above made factual position of the instant case, the appeal in hand may graciously be dismissed in favour of the Respondents No.1,2 & 3 in the interest of justice.


Secretary
Government of Khyber Pakhtunkhwa,
Establishment Department, Peshawar
For and behalf of Respondent No.1 and 3


Secretary
Government of Khyber Pakhtunkhwa
Elementary & Secondary Education Deptt
Respondent No.2

Before the Hon'able Service Tribunal Khyber Pakhtunkhwa, Peshawar

Service Appeal No.1293/2018

Ulfat Begum, District Education Officer (Female), Peshawar.....Appellant

Versus

Government of Khyber Pakhtunkhwa through Secretary E&SE Department and others

Respondents

Joint para-wise comments on and for behalf of the Respondents 1 – 3.

Respectfully Sheweth

The respondents submit as under:-

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1. That Para-1 is correct that the appellant has joined the Respondent Department against the SST (F) Post in the year 1987 and later on promoted to the Headmistress post in BPS-17 in 1997. She was allowed graded pay in the DPC Meeting held on 09-12-1989 and then Selection Grade in BPS-17 vide Notification dated 17-04-2000 falling at serial No.91/38 by the Competent Authority (copies of both the Orders are attached as Annexures A & B).
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- f. Incorrect and not admitted. The plea of the appellant is illegal as the act of the Respondent Department is in accordance with the relevant rules and provision of law.

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18/9

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- h. Incorrect and not admitted. The appellant cannot be promoted out of turn and without criteria in the Respondent Department. Therefore, the plea of the appellant is baseless and liable to be rejected.
- i. Incorrect and not admitted. The appellant has been treated as per law, rules and criteria as well as in accordance with the mandate of Article 25 of the Constitution of Islamic Republic of Pakistan 1973 by the Respondent Department.
- j. Incorrect and not admitted. The statement of the appellant is without any cogent reason and justification and liable to be rejected.
- k. Incorrect and not admitted. Each and every civil servant is liable to serve his parent Department with full zeal and zest for which she is drawing salaries and other allied financial facilities from the Respondent Department.
- l. Incorrect and not admitted. The cited judgments of the August Supreme Court of Pakistan is not applicable upon the case of the appellant of being deficient on both question of law and facts of the case. Therefore, plea of the appellant is illegal and liable to be rejected.
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Secretary
Government of Khyber Pakhtunkhwa,
Establishment Department, Peshawar
For and behalf of Respondent No.1 and 3

Secretary
Government of Khyber Pakhtunkhwa
Elementary & Secondary Education Deptt
Respondent No.2

Dear Sir,

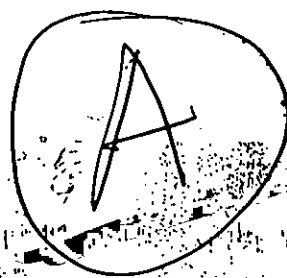
Submitted for vetting please:

18/6/2019

*U. Fed subject to necessary correction,
Attachment of annexures and of merit.*

Assistant Administrative Officer
Khyber Pakhtunkhwa
Service Tribunal Peshawar

18/6/2019



OFFICE OF THE DIRECTOR SECONDARY EDUCATION, N.W.F. PESHAWAR.

NOTIFICATION.

The Governor N.W.F.P, in consultation with the Department Promotion Committee is pleased to award P.S-17 as Selection Grade to the following Senior English Teacher/BPS-16 with effect from the dates noted against each :-

| S.No./S.No. in S/List. | Name/Designation/School | Date of award S/Grade B-17. |
|------------------------|--|-----------------------------|
| 1/351 | Eibi Zainab, SET, D/o Khazmin Gul GGHS Tenkal Bala, Peshawar. | 13.8.1995 |
| 2/351-A | Rehana Shaheen SET D/o Mohammad Gul GGMS Saro Killy Mohmand Agency. | 13.8.1995 |
| 3/352 | Bakht Sargand SET D/o Wali Mohammad GGHS Thana Malakan Agency. | -do- |
| 4/353 | Rozina Bibi SET D/o Mukhtar Ullah AAEO Bajour Agency at Khar. | -do- |
| 5/354 | Pulnaaj Begum SET S/o Aslam Khan, GGHS Sakha, at Malakand Agy. | -do- |
| 6/355 | Nighat Shamim SET D/o Sardar Mohammad GGHS No.2 Kohat. | -do- |
| 7/356 | Nishat Akhter D/o Sarwar Khan GGHS Akbar Para Nowshera. | -do- |
| 8/357 | Khurshid Begum D/o Nisar Ahmad GGHS Bazar Ahmad Khan Bannu. | -do- |
| 9/358 | Farzana Shaheen D/o Rab Nawaz Khan, GGHS No.5 D/o Khan. | -do- |
| 10/359 | Santaj Parveen D/o Nasir Ullah GGMS Central Jail DT Khan. | -do- |
| 11/360 | Zarina Begum D/o H. Mohammad Jan GGHS Tarnab Farm Peshawar. | -do- |
| 12/361 | Nighat Yasmin D/o Mohammad Sadique ADEO(F) Prg: Peshawar. | -do- |
| 13/362 | Mumtaz Begum D/o S. Lal Badshan GG JICA MODEL School Tour Landi Charsadda. | -do- |
| 14/363 | Mussarat Jabeen D/o Khadim Hussain GGMS Sheikhan, Kohat. | -do- |
| 15/364 | | |

(51)

| | | |
|-------------------|--|-----------------|
| 425 | Lifat Humma D/o Mohammad Ajab Khan GGHS No.2 Manshehra. | 1.9.95 |
| 80/42 | Shameen Akhter D/o Amir Mohammad, GGHS Togh Bala, Kohat. | 1.10.95 |
| 81/428 | Sohna Bibi D/o Abdul Kareem, GGHS No.2 Kohat. | 1.10.95 |
| 82/429 | Sajida D/o Atta Mohammad, GGHS Manglor Manshehra. | -do- |
| 83/431 | Zahida Yasmin D/o S. Ghulam Mustafa Shah GGMS Kiriwan FR Tank. | 1.4.96 |
| 84/432 | Naila Ruby D/o Amir Mohammad GGHS No.2 Kohat. | 1.4.96 |
| 85/432-A | Shamim Akhter D/o Khayal Gul, Ex-SET now working as Prl; GGHS Babri Banda, Kohat. | -do- |
| 86/434 | Nargis Rafi D/o Rafiullah GGHS Latamber, Karak. | -do- |
| 87/435 | Robina Saleem D/o Qazi Mohammad Saleem GGHS Oghi Manshehra. | -do- |
| 88/436 | Mussarat Shahnaz D/o Mahboob Elahi | -do- |
| 89/437 | Hamida Bibi D/o Ali Zaman, GGHSS Havelian Abbottabad. | -do- |
| 90/438 | Anwar Sultan D/o Niaz Niaz Moeen Now working as HM GGHS Waran Karak. | -do- |
| 91/438 | Shamim Akhter D/o Khayal Gul, Ex-SET now working as Prl; GGHS Babri Banda, Kohat. | -do- |
| 92/440 | Bushra Begum D/o Amin Nawaz Khan GGHSS Pir Pai Nowshera. | -do- |
| 93/441 | Naseem Akhter D/o Karam Elahi ASDEO(F) Peshawar. | -do- |
| 94/442 | Tajwar Sultan, D/o Ghulam Sarwar GGHS Landi Arbab Peshawar. | -do- |
| 95/443 | Farhat Jamal D/o Jamalud Din, GGHS No.2 Haripur. | -do- |
| 96/444 | Samia Jamal D/o Foujon Khan, GGHS Chamkan Peshawar. | -do- |
| 97/445 | Burhanisa Begum D/o Nam-e-Haq GGHS Baghicha Dheri Mardan. | -do- |
| 98/446 | Nafees Ara D/o Mian Khalil Ahmad, GGHS Dobrian Swabi. | -do- |
| 99/447 | Rabia Bibi D/o Abdul Wasid, ASDEO(F) Swabi. | -do- |

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10

Endst: No. 200-330 / Genl. S/Grade/SET/W-II. Dt: Peshawar the 17/4/2000.

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

1. Accountant General, NWFP, Peshawar.
2. Director of Education, FATA, NWFP, Peshawar.
3. Director Primary Education, NWFP, Peshawar.
4. Director General of Education, Federal Government Islamabad.
5. Director Secondary Education, Punjab.
6. Section Officer (Schools) Govt. of NWFP Education Deptt. w/r to his letter No. SO(S) 1-7/99/SET/M&F, dt: 6.4.2000.
7. All the Distt. Education Officers (Female) Secy. concerned.
8. All the Distt. Edu. Officers (F) Primary concerned.
9. Distt. Accounts Officers concerned.
10. Agency Education Officers concerned.
11. Agency Accounts Officers concerned.
12. Principals G.G.H.S.S. concerned.
13. Headmistresses GGHS concerned.
14. Officials concerned.
15. S.D.E.Os (F) concerned.

Mahmuda Begum
Additional Directress Secondary
Education, NWFP, Peshawar.

M. Ishfaq/

OFFICE OF THE DIRECTOR OF EDUCATION (SCHOOLS), N.W.F.P., PESHAWAR.

LEVEL :-

Consequent upon the approval given by the Departmental Selection Committee in their meeting held on 9.12.1989, the following SETs are hereby allowed graded pay w.e. from the date of taking over charge after/from the date of allocation on merit, subject to the conditions given below :-

| S.No. | Name and School. | D/O Allo- cation on merit. | D/O taking over charge. | Date from which graded pay is allowed. |
|-------|------------------|----------------------------------|----------------------------------|--|
| 1 | 2 | 3 | 4 | 5 |

ZONE-I

1. Mst. Zahida Yasmin, B/O S. Ghulam- 8.3.1988 8.3.88 8.3.1988.
Mustafa Shah, SET, (GGMS Dabkot-
(S.W.A.) transferred to GGMS
Kiriwan (FR-D.I.Khan), BA, B.Ed,
1984-85/4676/1200, 563/1000/D.I.Khan

ZONE-II

Science.

1. Mst. Farhat Shaheen D/O Wali-ullah 8.3.88 1.6.88 1.6.88
Khan, SET, GGHS, Zaida (Swabi)
B.Sc.B.Ed, 1986-87/649/1100/590/1000
Mardan.

ARTS.

1. Mst. Intinz Begum D/O Hamidud Din 8.3.1988 4.5.88 4.5.88
SET, GGHS, Marghuz, Mardan,
BA B.Ed, 1981/457/1000/Peshawar
(2nd chance).
2. Mst. Lakhtiar Begum D/O Mohammad 8.3.88 21.4.88 21.4.88
Inayat Shah, GGCHSS, Peshawar
BA B.Ed, 1983 (Supply) 473/1000/
Peshawar (2nd chance).
3. Mst. Ulfat Begum D/O Kifayatullah 8.3.88 17.4.88 17.4.88
SET, GGHS, Harichand (Charsadda)
MA, B.Ed, 1984-85/485/1000/Pesh.
4. Mst. Bushra Begum D/O Amir Nawab 8.3.88 19.4.88 19.4.88
Khan, SET, GGHS, Dobian (Mardan)
BA, B.Ed. 1984-85/482/1000/Posh.
5. Mst. Nasim Akhtar D/O Karam Ilahi 8.3.88 1.6.88 1.6.88
SET, (GGHS Kalabat Swabi) trans-
ferred to ASDEJ (F) Nowshera,
BA, B.Ed, 1984-85/475/1000/Posh.
6. Mst. Tajwar Sultan D/O Ghulam- 8.3.88 27.11.88 27.11.88
Sarwar, SET, GGHS, Mathra (under
transfer to GGHS Landi Arbab, Pesh.)
BA, B.Ed, 1984-85/474/1000/Pesh.
7. Mst. Samia Jamal D/O Faujun Khan 8.3.88 26.11.88 26.11.88
SET, GGHS, Chamkani, BA, B.Ed, 84-85/
468/1000/Peshawar.

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| Inter. See Seniority # | Name of officers | Qualification | Date of Birth | Domicile | Date of 1st; Entry in Edu: Deptt | Date of Present post | Method of recruitment | BPS | Designation/ place of posting | REMARKS |
|------------------------|---|-----------------|---------------|----------|----------------------------------|----------------------|-----------------------|-----|--|---------|
| 21 | Zubaida Haneef D/O Muhammad Haneef Khan | MA MEd M. Phill | 3/12/1976 | Karachi | 5/30/2011 | 5/30/2011 | do | 18 | DEO (F) Mansehra | do |
| 22 | Surraya Begum D/O Aman Ullah Khan | MA MEd | 4/30/1966 | Karachi | 5/30/2011 | 5/30/2011 | do | 18 | Principal GGHSS Phase-III Hayatabad Peshawar | do |

Certificate

- i) That the seniority list is widely circulated.
- ii) That seniority list is undisputed/ uncontroversial
- iii) That there is no litigation pending/involved

Deputy Director (Female)
Elementary & Secondary Educaiton
Khyber Pakhtunkhwa Peshawra

(Signature)

Annex R

Final Seniority List of Female Officers (Management cadre) BS-18 as it stood on 31/12/2017

| Sl. No. | Name of officers | Qualification | Date of Birth | Domicile | Date of 1st; Entry in Edu; Deptt | Date of Present post | Method of recruitment | BPS | Designation/ place of posting | REMARKS |
|---------|---|---------------|---------------|-----------------|----------------------------------|----------------------|-----------------------|-----|--|---|
| 1 | Shafqat Rehman D/O Fazal Rehman | MA BEd | 4/15/1970 | Swabi/2 | 3/1/1992 | 5/30/2011 | D/Selectee | 18 | on leave | Notification No. SO (S/F) E&SED/3-2/2011/DO (F) dated 30/5/2011 |
| 2 | Asmat Ara Qureshi D/O Muahmmad | MA MEd | 4/10/1964 | Bannu/4 | 10/10/1990 | 5/30/2011 | do | 18 | SS GGHSS Comp: Peshawar | do |
| 3 | Dilshad Begum D/O Muhammad | MA MEd | 1/9/1968 | Swat/3 | 12/1/1988 | 5/30/2011 | do | 18 | Dy. Director (F) Directorate of E&SE KPK | do |
| 4 | Parveen Begum D/O Gul Daraz Khan | MA MEd | 1/1/1970 | Karak/4 | 5/25/1995 | 5/30/2011 | do | 18 | DEO (F) DIKhan | do |
| 5 | Naghmana Sardar D/O Sardar Hussain Khan | MSc MEd | 9/23/1967 | Haripur/5 | 8/18/2011 | 8/18/2011 | do | 18 | Ex-DEC (F) Swabi | Notification No. SO (S/F) E&SED/3-2/2011/DO (F) dated 18/2/2011 |
| 6 | Bibi Rizwana D/O Sikandar Khan | MA MEd | 8/4/1964 | Kurram Agency/1 | 10/12/1982 | 5/30/2011 | do | 18 | Inst. RITE (F) Kohat | Notification No. SO (S/F) E&SED/3-2/2011/DO (F) dated 30/5/2011 |
| 7 | Naheed Anjum D/O Shah Jehan | MA MEd | 12/9/1970 | Nowshera/2 | 3/8/2007 | 5/30/2011 | do | 18 | Deputy Director Training Directorate of E&SE KPK | do |
| 8 | Farzana Sardar D/O Sardar Khan | MA MEd | 4/2/1969 | Kohat/4 | 10/10/1990 | 5/30/2011 | do | 18 | DEO (F) Hangu | do |
| 9 | Bibi Razia D/O Gulistan Khan | MA MEd | 5/16/1970 | Karak/4 | 5/17/1988 | 5/30/2011 | do | 18 | Principa GGHSS Chokara Karak | do |

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| Inter See Ser. # | Name of officers | Qualification | Date of Birth | Domicile | Date of 1st; Entry in Edu: Deptt | Date of Present post | Method of recruitment | BPS | Designation/ place of posting | REMARKS |
|------------------|--|------------------|---------------|-------------|----------------------------------|----------------------|-----------------------|-----|---------------------------------|---|
| 10 | Rabia Anees D/O Abdul Aziz | MA MEd M. Phill | 5/12/1976 | Peshawar/2 | 10/1/2008 | 5/30/2011 | do | 18 | SS GGHSS | do |
| 11 | Zuhra Begum D/O Sadullah | MA MEd M. Phill | 4/20/1977 | Moh: Agy/1 | 5/9/2002 | 5/30/2011 | do | 18 | Shahdhand Baba Mardan | do |
| 12 | Sabira Parveen D/O Oazi Abdul Rauf | MA MEd | 7/31/1972 | DIKhan/4 | 2/18/1999 | 5/30/2011 | do | 18 | Principal GGHSS Kalu Khan Swabi | do |
| 13 | Ulfat Begum D/O Kifayat Ullah | MA MEd | 4/1/1961 | Charsadda/2 | 5/30/1997 | 5/30/2011 | do | 18 | DEO (F) Lakki | do |
| 14 | Samina Ghani D/O Zahir-ud-Din | MA MEd | 4/15/1966 | Peshawar/2 | 3/17/1990 | 5/30/2011 | do | 18 | DEO (F) Charsadda | do |
| 15 | Azra Bibi D/O Abdul Qayyum Shah | MA MEd | 4/1/1975 | S.W.Agy/1 | 9/1/1999 | 8/18/2011 | do | 18 | DEO (F) Mardan | do |
| 16 | Shamim Akhtar D/O Rahman Gul | MSc MEd M. Phill | 8/10/1976 | Peshawar/2 | 5/30/2011 | 5/30/2011 | do | 18 | DEO (F) Tank | Notification No. SO (S/F) E&SED/3-2/2011/DO (F) dated 18/8/2011 |
| 17 | Rehana Yasmin D/O Abdul Rehman Abbasi | M MEd /ETM | 12/23/1972 | Haripur/5 | 5/30/2011 | 5/30/2011 | do | 18 | DEO (F) Swat | Notification No. SO (S/F) E&SED/3-2/2011/DO (F) dated 30/5/2011 |
| 18 | Sofia Tabbasum D/O Noor ul Islam | MA MEd | 5/22/1967 | Peshawar/2 | 5/30/2011 | 5/30/2011 | do | 18 | DEO (F) Battagram | do |
| 19 | Syeda Anjum D/O Syeda Hussain Shah | MSc MEd | 8/2/1969 | DIKhan/4 | 4/9/2011 | 8/18/2011 | do | 18 | DEO (F) Peshawar | do |
| 20 | Zaib-un-Nisa D/O Mir Salam Khan | MA MEd | 1/29/1977 | Karak/4 | 5/30/2011 | 5/30/2011 | do | 18 | DEO (F) Bannu | Notification No. SO (S/F) E&SED/3-2/2011/DO (F) dated 18/8/2011 |
| | | | | | | | | | DEO (F) Kohat | Notification No. SO (S/F) E&SED/3-2/2011/DO (F) dated 30/5/2011 |

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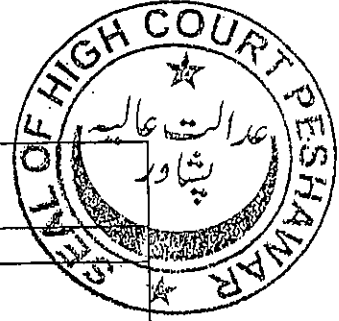
Annex-D

Annex-D

28

IN THE PESHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET



| Date of order or proceedings. | Order or other proceedings with signature (s) of Judge(s) |
|-------------------------------|---|
| (1) | (2) |
| 18.09.2018. | <p><u>W.P. No.4265-P/2018</u></p> <p><u>Present:</u> Mr. Zartaj Anwar, Advocate for petitioner.</p> <p>***</p> <p><u>MUHAMMAD NASIR MAHFOOZ, J.:-</u> The petitioner has filed the instant petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 with the following prayer:</p> <p>On acceptance of this writ petition an appropriate writ may please be issued by declaring the acts and omission of the respondents whereby they are discriminating in respect of the petitioner, the services of the similarly placed colleagues were counted from the date of initial appointment in the department and on the basis of which promoted to higher posts, but refuse the same to the petitioner, petitioner serving the Elementary and Secondary Education Department since 1987 on regular basis, this discriminatory treatment meted out to the petitioner is highly illegally, unlawful, without lawful authority, hence the petitioner deserve similar treatment in view of the reported cases of the apex court i.e. SCMR 1996 Page-1185, 2009 SCMR Page-1 etc, thus the services of the petitioner may please be counted as done to the colleagues of the petitioner with arrears and back benefits.</p> |

[Handwritten signature]

ATTESTED

EXAMINER
Peshawar High Court

27 SEP 2018

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2. We have heard learned counsel for the petitioner and have gone through the record.

3. In the instant writ petition, petitioner is aggrieved of the action of respondents whereby she has not been promoted to the higher post whereas her junior has been granted promotion to BPS-20. No doubt, that the petitioner is civil servant and her services are governed by the KPK Civil Servants Act 1973, hence, any civil servant aggrieved of any decision and relating to terms and conditions of service has got remedy to invoke jurisdiction of the Provincial Services Tribunal. The instant matter also relates to the terms and conditions of service, therefore, petitioner may adopt proper remedy as available under the law.

The writ petition is therefore disposed of accordingly.

[Signature]
CHIEF JUSTICE

[Signature]
JUDGE

CERTIFIED TO BE TRUE COPY
EXAMINED
Peshawar High Court, Peshawar
Authenticated under Article 84 of
the Constitution of Pakistan
27 SEP 2018

6830

No. 2719/18

Date of Presentation of Application 27/9/18

No of Pages 27

Copying Fee 360

Urgent Fee 360

Total 720

Date of Presentation of Application 27/9/18

Date of Delivery of Order 27/9/18

Received By [Signature]

Shahid Ali PS

(DB) Hon'ble Mr. Justice Waqar Ahmad-Sethi, C.J. and
Hon'ble Mr. Justice Muhammad Nasir Mahfooz

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