

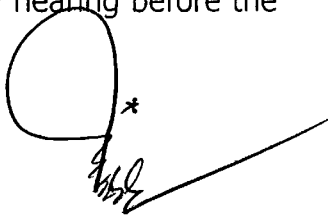


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1061/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/06/2022	<p>The appeal of Nighat Jehan presented today by Mr. Ashraf Ali Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	4/7/22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>13.7.22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
	13.07.2022	<p>Junior of learned counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for preliminary hearing before the S.B on 13.09.2022.</p> <p> (Mian Muhammad) Member (E)</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1067 /2022

Nighat Jehan W/o Prof. Engr. Noor Ul Qamer

SDM, GGHS Achini Payan,

PeshawarAppellant.

Versus

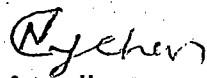
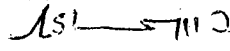
The Secretary (E & SE) KPK, Peshawar & others

.....Respondents.

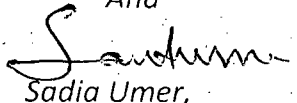
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S.No.	Description of Documents	Date	Annexure	Pages
1.	Service Appeal with Affidavit.			1-9
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3.	Application for condonation of delay with Affidavit			12-13
4.	Copy of Appointment Order / Notification No.9857-9917/11 dated 26-06-1997 of appellant and respondents No.4 & 5	26-06-1997	A	14-15
5.	Copy of promoted order to the post of SDM (BPS-16) of Appellant and Respondent No.4 & 5 Vide consolidated order Endst: No.4007-13 / File No.2 / Promotion Senior DM B-16: Dated Peshawar the 21/02/2012 passed by Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar (Respondent No.2)	21/02/2012	B B1	16-17
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S.No.	Description of Documents	Date	Annexure	Pages
	copy of objection application			
7.	Copy of impugned promotion Orders / Notification No.5360-761 dated 11-01-2022 and Notification No.650-83 dated 11-01-2021, whereby respondent No. 4 and 5 who were junior to the appellant; were promoted to the post of SST.	11-01-2022 & 11-01-2021	D	21-24
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 Appellant
 Through 
 Ashraf Ali Khattak
 Advocate,
 Supreme Court of Pakistan


 Ali Bakht
 Advocate, Peshawar.

And

 Sadia Umer,
 Advocate, Peshawar.

Dated: / 06 / 2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 10/62/2022

Nighat Jehan W/o Prof. Engr. Noor Ul Qamer

SDM, GGHS Achini Payan,

Peshawar.....Appellant

Versus

1. The Secretary,
Education (E & SE), Department,
Govt: of Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.
2. The Director,
(E & SE), Department,
Govt: of Khyber Pakhtunkhwa,
Near Malk Saad, BRT, Terminal, Peshawar.
3. The District Education Officer (F),
(E & SE), Department,
G. Road, Peshawar.
4. Mst: Mst: Rehana Khatun D/o Habib Ur Rehman,
SST (G) (BPS-16),
GGHS Surizai Bala, Peshawar.
5. Mst: Shazia Bibi D/o Karam Ilahi
GGHS, Khappa, Peshawar. Respondents.

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE IMPUGNED PROMOTION ORDER /
NOTIFICATION NO.650-83, DATED 11-01-2022 AND
IMPUGNED PROMOTION ORDER / NOTIFICATION
NO.5360-76 DATED 11-01-2021 THEREBY JUNIOR TO
THE APPELLANT MST: REHANA KHATUN D/O
HABIB UR REHMAN (SDM) AND MST: SHAZIA

**BIBI D/O KARAM ILAHI (SDM) AND OTHERS,
WERE PROMOTED TO THE POST OF SST (G) (BPS-16)
ON REGULAR BASIS AND AGAINST WHICH
APPELLANT FILED DEPARTMENTAL APPEAL, WHICH
IS STILL PENDING WITHOUT DISPOSAL.**

PRAYER:

On acceptance of the instant service appeal, this Hon'ble Tribunal may graciously be pleased to:-

- i. **Declare** the impugned promotion Order / Notification No.650-83, dated 11-01-2022 and impugned promotion Order / Notification No.5360-76 dated 11-01-2021 thereby junior to the appellant Mst: Rehana Khatun D/o Habib Ur Rehman (SDM) and Mst: Shazia Bibi D/o Karam Ilahi (SDM) and others, were promoted to the post of SST (G) BPS-16 on regular basis as illegal, discriminatory, without lawful authority and set aside the same.
- ii. **Direct** the respondents to notify fresh seniority list as per law, rules and policy, immediately convene DPC meeting and promote the appellant to the post of SST (G) (BPS-16) with effect from the date junior to her have been promoted.
- iii. **Any other relief** as deemed appropriate under the circumstances of the case may also graciously be allowed to the appellant.

Respectfully Sheweth,

The facts given rise to the present service appeal are as under;

1. That appellant is highly educated and qualified (MA & M.Ed), presently serving against the post of Senior Drawing Master (BPS-16) (hereinafter referred to as "SDM"). Appellant was enrolled as DM (Drawing Master) (hereinafter referred to as "DM") vide order / Notification No.9857-9917/11 dated 26-06-1997 on regular basis along with others including Mst: Rehana Khatun D/o Habib Ur Rehman and

Mst: Shazia Bibi D/o Karam Ilahi (Respondents No.4 & 5). (Copy of appointment order is attached as **Annexure-A**)

1. That Rule 17 (1) (a) of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 provides as to the following.

17: Seniority :- (1) the seniority inter se of civil servants (appointed to a service, cadre or post) shall be determined:-

(a) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission [or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and

From the above provision of law, it is clear that seniority of appointees who are selected and appointed by initial recruitment through one batch or order shall be determined in accordance with merit position assigned to them by Departmental Selection Committee. In this view of the matter; appellant lie at Serial No.6 and whereas Mst: Rehana Khatun D/o Habib Ur Rehman (DM) and Mst: Shazia Bibi D/o Karam Ilahi (DM) are laying at Serial No. 15 and 11 respectively therefore, appellant is established senior to Mst: Rehana Khatun D/o Habib Ur Rehman (DM) and Mst: Shazia Bibi D/o Karam Ilahi (DM).

The same view of the matter has also been adopted and endorsed by the appointing authority Vide serial No.4 of the terms and conditions of the appointment Notification dated 26-06-1997.

2. That Section 8 (1) of the Khyber Pakhtunkhwa Civil Servant Act, 1973 provides that for proper administration of a service, cadre or [post], the appointing authority shall cause a seniority list of the members for the time being of such service, cadre or [post] to be prepared and subsection (5) of the same section provide that the seniority lists prepared under sub-section(1), shall be revised and notified in the

official Gazette at least once in a calendar year, preferably in the month of January.

3. That the department has neither notified any tentative seniority list nor any final seniority list of DM (District Peshawar) till the time of convening the meeting of Departmental Promotion Committee meeting for the purpose of impugned promotion of Drawing Master to the post of Senior Drawing Master.
4. That Departmental Promotion Committee was held and resultantly appellant and respondent No.4 and 5 were promoted to the post of SDM (BPS-16) Vide consolidated order Endst: No.4007-13 / File No.2 / Promotion Senior DM B-16: Dated Peshawar the 21/02/2012 passed by Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar (Respondent No.2) (**Annexure-B & B1**).
5. That Rule 17 (1) (b) of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 provides as to the following.

17: Seniority :- (1) the seniority inter se of civil servants (appointed to a service, cadre or post) shall be determined:-

- (b) In the case of civil servants appointed otherwise, with reference to the date of their continuous regular appointment in the post; provided that civil servants selected for promotion to a higher post in one batch shall, on their promotion to the higher post, retain their inter se seniority as in the lower post.

Since appellant was established senior in the lower grade (DM) therefore, as per rules; appellant was entitled for senior position in the seniority list.

6. That respondents circulated undated and unsigned Revised Tentative Seniority list through WhatsApp, wherein respondent No.4 and 5 were placed at serial No.7 & 6 and whereas appellant was assigned junior position and was placed at serial No.11, which appellant impugned through objection application. (Copy of seniority list and objection application are attached as **Annexure-C and C1**).
7. That respondents failed to decide the objection application till the date. Respondents have also failed to circulate any sort of final seniority list till the date.
8. That worst of the thing is that Department failed to cause seniority list even after the above cited promotion order / Notification Endst:4007-13 / File No.2 / Promotion Senior DM B-16: Dated Peshawar the 21/02/2012 till the date and more so convened DPC meeting in the absence of any legal / lawful seniority list, which resulted that both respondent No. 4 and 5 (Mst: Rehana Khatun D/o Habib Ur Rehman (SDM) and Mst: Shazia Bibi D/o Karam Ilahi) (SDM), who were junior to the appellant; were promoted to the post of SST vide Notification No.5360-761 dated 11-01-2022 and Notification No.650-83 dated 11-01-2021 respectively (**Annexure-D**).
9. That appellant being aggrieved from the above impugned promotion orders; submitted departmental appeal (**Annexure-E**), which is still pending without disposal, hence the statutory period has elapsed therefore, the instant service appeal inter alias on the following grounds.
 - A. That the appellant has not been treated by the respondents in accordance with law, rules and policy on the subject and acted in violation of Articles 4 and 10-A of the Constitution of Islamic Republic of Pakistan. Respondents were under legal obligation to cause tentative seniority list, call objection if any from all concerned and

than issue final seniority list before convening DPC meeting, but respondent in violation of the prescribed rules and policy; without issuing tentative and final seniority list convened DPC meeting, which resulted the promotion of respondents No.4 and 5 in violation of seniority rules and criteria for promotion therefore, this Hon'ble Tribunal has got the jurisdiction to interfere with and direct the respondents to promote the appellant with effect from the date junior to her have been promoted.

- B. That as per mandate of law; initially a tentative seniority list is notified and objection is called upon from all concerned, who may feel aggrieved from their seniority position, but in the instant case all proceeding were initiated secretly and at the back of the appellant and appellant was condemned unheard which is the violation of the well-known principle of law "Audi altram Partem". This principle of law was always deemed to have embedded in every statute even though there was no specific or express provision in this regard.An adverse order passed against a person without affording him an opportunity of personal hearing was to be treated as void order. Reliance is placed on 2006 PLC (CS) 1140. As no proper personal hearing has been afforded to the appellant before the issuing of the impugned orders, whereby appellant was not only deprived from his due seniority position, but also from his accrued right of promotion therefore, on this ground as well the impugned orders are liable to be set aside.
- C. That appellant has highly been discriminated and that too not only in term of his seniority but also discriminated from his due and legal regular promotion to the post SST (G) and promoted juniors to the appellant. Every government servant has legitimate expectancy of rising up in government hierarchy by means of regular promotion, but

respondents in violation of the principle of legitimate expectancy deprived the appellant from his seniority and further promotion.

10. That Rule 17 (1) (a) of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules, 1989 provides as to the following.

17: Seniority :- (1) the seniority inter se of civil servants (appointed to a service, cadre or post) shall be determined:-

(c) in the case of persons appointed by initial recruitment, in accordance with the order of merit assigned by the Commission [or as the case may be, the Departmental Selection Committee;] provided that persons selected for appointment to post in an earlier selection shall rank senior to the persons selected in a later selection; and

From the above provision of law, it is clear that seniority of appointees who are selected and appointed by initial recruitment through one batch or order shall be determined in accordance with merit position assigned to them by Departmental Selection Committee. In this view of the matter; appellant lie at Serial No.6 and whereas Mst: Rehana Khatun D/o Habib Ur Rehman (DM) and Mst: Shazia Bibi D/o Karam Ilahi (DM) are laying at Serial No. 11 and 15 respectively therefore, appellant is established senior to Mst: Rehana Khatun D/o Habib Ur Rehman (DM) and Mst: Shazia Bibi D/o Karam Ilahi (DM).

The same view of the matter has also been explained and endorsed by the appointing authority Vide serial No.4 of the terms and conditions of the appointment Notification dated 26-06-1997.

11. That Section 8 (1) of the Khyber Pakhtunkhwa Civil Servant Act, 1973 provides that for proper administration of a service, cadre or [post], the appointing authority shall cause a seniority list of the members for the time being of such service, cadre or [post] to be prepared and subsection (5) of the same section provide that the seniority lists prepared under sub-section(1), shall be revised and notified in the

official Gazette at least once in a calendar year, preferably in the month of January.

- D. That appellant would like to seek the permission of this Hon'ble Court to advance other grounds at the time of hearing.

In view of the above explained positions, it is humbly prayed that the instant service appeal may be allowed as prayed for above.

Ayhan
Appellant

Through

Ashraf Ali Khattak
Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

Ali Bakht
Ali Bakht

Advocate, Peshawar.

And

Sadia Umer
Sadia Umer,
Advocate, Peshawar.

Dated: 07/01/2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2022

Nighat Jehan W/o Prof. Engr. Noor Ul Qamer
SDM, GGHS Achini Payan,

PeshawarAppellant.

Versus

The Secretary Education Govt: of KPK, Peshawar & others

.....Respondents.

Affidavit

I Nighat Jehan W/o Prof. Engr. Noor Ul Qamer SDM, GGHS Achini Payan, Peshawar solemnly affirms and declare on Oath that the Contents of the instant service appeal are correct and true to the best of my knowledge and belief and nothing has been concealed from the notice of this Hon,ble Tribunal.

Nighat Jehan
Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ /2022

Nighat Jehan W/o Prof. Engr. Noor UI Qamer
SDM, GGHS Achini Payan,
PeshawarAppellant.

Versus

The Secretary (E & SE) KPK, Peshawar & others
.....Respondents.

Application for interim Relief.

Respectfully Sheweth,

Applicant humbly submit as to the followings.

1. That the accompanying service appeal is being filed today and to be fixed for preliminary hearing.
2. That respondents are going to fill up the remaining vacancies meant for departmental promotion in forth coming days as per bonafide knowledge and information of the applicant.
3. That applicant is established senior and in case the DPC meeting is held and applicant is derived from her promotion to the post of SST; she will face irreparable loss. The balance of convenience is also in favour of applicant.
4. That fact and grounds taken in the main service appeal may kindly be considered as part and parcel of the instant application.

In view of the above submission, it is humbly prayed that respondents may kindly be restrained to convene DPC and promote others till the final disposal of the accompanying service appeal.

Through

Nighat
Applicant
Ashraf Ali Khattak
Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ /2022

Nighat Jehan W/o Prof. Engr. Noor Ul Qamer
SDM, GGHS Achini Payan,

PeshawarAppellant.

Versus

The Secretary Education Govt: of KPK, Peshawar & others

.....Respondents.

Affidavit

I Nighat Jehan W/o Prof. Engr. Noor Ul Qamer SDM, GGHS Achini Payan, Peshawar solemnly affirms and declare on Oath that the Contents of the instant application for interim relief are correct and true to the best of my knowledge and belief and nothing has been concealed from the notice of this Hon,ble Tribunal.

Nighat Jehan
Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ /2022

Nighat Jehan W/o Prof. Engr. Noor Ul Qamer
SDM, GGHS Achini Payan,
PeshawarAppellant.

Versus

The Secretary (E & SE) KPK, Peshawar & others
.....Respondents.

Application of delay, if any.

Respectfully Sheweth,
Appellant humbly submit as to the followings.

1. That the titled service appeal is being filed to day.
2. That appellant has impugned the promotion Orders / Notification No.5360-761 dated 11-01-2022 and Notification No.650-83 dated 11-01-2021, whereby respondent No. 4 and 5 who were junior to the appellant; were promoted to the post of SST.
3. That appellant was not aware of the Notification dated 11-01-2021 and got the knowledge of the same, when came across the order of promotion of Mst: Rehana Khatun and immediately thereafter impugned the same through departmental appeal.
4. That appellant has got the impugned order of promotion dated 11-01-2021 of the respondent No.5 along with impugned order dated 11-01-2022 and limitation runs from the date of knowledge and communication.
5. That promotion is recurring cause of action and no limitation runs against promotion order.
6. That appellant would like to seek the permission of this Hon'ble Tribunal to place rulings of the Apex Court on the subject.

In view of the above, it is humbly prayed that delay of any made against order of promotion of respondent No.5 dated 11-01-2021 may kindly be condoned in the best interest of justice.

Nighat Jehan
Appellant

Through

Ashraf Ali Khattak
Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2022

Nighat Jehan W/o Prof. Engr. Noor Ul Qamer
SDM, GGHS Achini Payan,
PeshawarAppellant.

Versus

The Secretary Education Govt: of KPK, Peshawar & others
.....Respondents.

Affidavit

I Nighat Jehan W/o Prof. Engr. Noor Ul Qamer SDM, GGHS Achini Payan, Peshawar solemnly affirms and declare on Oath that the Contents of the instant application for condonation of delay if any are correct and true to the best of my knowledge and belief and nothing has been concealed from the notice of this Hon,ble Tribunal.

Nighat Jehan
Deponent

APPOINTMENTS

Consequent upon their selection by the Departmental Selection Committee, The DEPT. Director of Education (S) Peshawar has been pleased to appoint the following trained Drawing Masters at the schools noted against their names in MFS, 9 at (Rs. 1605-97-3060) plus usual allowances as admissible under the rules with immediate effect subject to the following existing terms and conditions.

S.No.	Name & Address	D/o birth	No. in Merit list/Marks	School	Remarks
1.	Tasleem Akhter, D/O S. Mohammad Akbar Ramdas Bazar Peshawar.	4.11.71	1/61	GGHS No: 3 Pesh; Ctt; vice Tillat Bibi terminated as not selected on merit.	
2.	Rozeen Bibi, D/O Amanullah Hassan, D/rd Circular Rd, Pesh.	14.72	2/61	GGHS BSD, Pesh; vice Mahjabin Khusr terminated as noted selected on merit.	
3.	Samina Begum, D/O Yagfirullah Tangi Barazai Charsadda.	20.10.70	3/57	GGHS Tangi, vice Sadia Bahad terminated as not selected on merit.	
4.	Sira Sabeen, D/O Fazal Karim Dabgari, Peshawar City.	26.10.72	5/55	GGHS Tarney Form Pesh Vice Iqbal Rukh terminated as not selected on merit.	
5.	Nishat Begum, D/O Iqbal Gul Moh: Bosa Dhal, Charsadda.	6.7.64	6/54	GGMS Sheikh Saad Khan vice Mina Gul terminated as not selected on merit.	
6.	GGHS TUBB PAVAN Peshawar	15.4.73	4/53	GGMS Maloz, vice ...	
7.	Razia Sultana, D/O Ghulam Qadir Tarkha, Charsadda.	16.3.76	7/51	GGHS Akbar Pura vice Salma terminated as not selected on merit.	
8.	Nazli, D/O Mir Mohammad Turangzai, Charsadda.	1.4.70	9/50	GGMS, Charsadda, vice Servia terminated as not selected on merit.	
9.	Saima Akram, D/O Mohammad Akram, C/O Noor Bacha DSE, Office.	2.11.74	10/50	GGHS Yaka Toot Peshawar Vice Rukhsana terminated as not selected on merit.	
10.	Shamim Rahat, D/O Rahat Gul Umerzai, Charsadda.	12.4.63	11/49	GGMS Harichand vice Naz Gul terminated as not selected on merit.	
11.	Rahat Khatoon, D/O Habibullah Rinnah, Charsadda.	12/48		GGHS Warsak, Gdony Peshawar vice ... terminated as not selected on merit.	
12.	Zarfun Nisa, D/O Hussain Dhal Dag Besud Nowshera.	13/46		GGMS Dag Besud vice Mehmas ara terminated as not selected on merit.	
13.	Mina Gul, D/O Ghulam Rabbani Tangi, Charsadda.	20.2.74	3/46	GGMS Naptan Killi vice Nacia Begum terminated as noted selected on Merit.	

(Page 2 Contd.)

Amended

(2)

14. Rozina Huma D/O Shah Mahmood H/No; 74 Gulberg No; 2 Pesh; Ott;	1/3/73	14/46	GGMS Foroz Abad vice Ranagal terminated as not selected on merit.
15. Shahizia Bibi D/O Karam Ilahi Andersher Peshawar.	1.2.75	15/45	GGMS Foroz Abad Cnd. Vice Begum terminated as not selected on merit.
16. Nabila Naz D/O Ashiq Salim PTC GGPS No; 1 Tehkal Pesh;	10.10.70	16/44	GGMS Sarband vice Shakila terminated as not selec- ted on merit.
17. Madina Gul D/O Subhan Shah Wazir Bagh Rd; Peshawar City	2.3.75	17/44	GGMS Shaikh Mohammadi against vacant post.
18. S. Farhat D/O S. Busarg Shah Jehangir Pura Peshawar.	7.5.75	18/44	GGMS Sufaid Sang vice Humair Naz terminated as not selected on merit.
19. Samina Naheed D/C Sherin Gulgusht Colony Q/Qtr; Pesh;	2.2.62	19/43	GGMS Pabbi against vaca- nt post.
20. Shaheen Begum D/O Mohammed Zahir Shah Akbar pura NSR;	1.1.75	20/43	GGMS Pabbi, vice Nazia terminated as not selec- ted on merit.
21. Shabina D/O Hashim Khan Ghani Baloch Abad Pesh;	7.6.74	21/41	GGMS Sitter Shah Colony vice D/O Pabbi terminat- ed as not selected on merit.
22. Adeb Gul D/O Subhan Shah H.No; 595 Kohat Gate Pesh;	25.5.69	22/39	GGMS Pushtoon Gheri Vice Shakila Begum as not selected on merit.
23. Shakira Bibi D/O Ghulam Jafar H.No; 3725 Kibli Gate Peshawar.	21.5.73	23/41	GGMS Baghbanpura Nowshera vice Shaheen Akhter terminated as not selec- ted on merit.
24. Maryum Noor D/O Noor. Mohammad Civil Quarter Peshawar.	30.8.74	24/41	GGMS Mandoori vice Misarrat Jehan terminated as not selected on merit.
25. Nasrin Akhter D/O Zahoor Talab Harichand Charsadda.	1.5.70	25/21	GGMS Shaikh No; 6 Cnd; Vice Sultan Begum termi- nated as not selected on merit.

TERMS & CONDITIONS/

- 1 They will be governed by such rules and regulations as may be prescribed by the Govt; from time to time for the category of the Govt; servants to which they belong.
- 2 Their services will be liable to termination on one month notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
- 3 They should join the post within one month of the issue of this Notification.
- 4 Their inter-se seniority will be determined in accordance with the merit of Departmental Selection Committee.
- 5 Charge reports should be submitted to all concerned.
- 6 They shall be on probation for a period of two years and will have to pass Departmental examination. In case a candidate fails to qualify the Departmental exam; he will be given one more chance if he fails again then his name will be deleted from the list.

- 7. Their original certificates Detrees should be checked and verified by the concerned University, NISE/IDE & Islamic Madrasahs concerned before handing over charge.
- 8. Services Books of the teachers must be prepared complete in all respects before handing over charge.
- 9. The declaration of assets should be obtained from them immediately and placed on record.
- 10. They are required to produce health and age certificates from Medical authorities before taking over charge.
- 11. Charge should not be given to the over age candidate. His case for age relaxation be sent to the concerned authority.
- 12. Efforts for transfer before the completion of tenure will disqualify him from the service.
- 13. No TA/DA etc is allowed.

(GHULAM MUSTAFA)
 DIVL: DIRECTOR OF EDUCATION (SCHOOLS)
 PESHAWAR DIVISION PESHAWAR

Endst; No: 7/19857-7917/1/1/1 / Dated Peshawar the 25/6/97

- Copy to the:-
- 1. PS to Minister for Education NWFP Peshawar.
 - 2. PS to Secy; Education NWFP, Peshawar.
 - 3. AG, NWFP/DAO Charsadda/Mowshera, P.
 - 4. DEC (M) Secy; Peshawar/Charsadda/Mowshera.
 - 5. Principal/Headmaster, concerned.
 - 6. Supdt; E/Branch.
 - 7. PA to DSE, NWFP Peshawar.
 - 8. P/File.

Divl; Director of Education (Schools)
 Peshawar Division Peshawar

Jehanzeb.

Att-std
 \$

Ann-B

DM (F) Peshawar. 1



Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
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E-mail rafiq_kk851@yahoo.com

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(IRA)/1-10/ERS/E/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/1-1/10-22(R)/2010 dated 10.07.2012, the following DMs B-15 are hereby promoted to the post of Senior DM BPS-16 (Rs.10000-800-31000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior DM BPS-16 posts:-

Total No. of DM (F) Posts duly verified by the DAO	145
1/3 share of Senior DM Posts	48
Share of promotion 100 %	48
Promoted to the post of Senior DM B-16.	39
Deferred for Promotion	09

S. No	S.L. No	Name Of Official	Place Of Posting	Date of Birth	Remarks
1	6	Kobina Shahen	RITE (F) Peshawar	15/11/1951	Services placed at the disposal of DEO (F) Peshawar for further posting.
2	8	Riaz Begum	GGHS Civil Colony	20/05/1959	Do
3	12	Kausar Tasleem	GGMS Gulbela Peshawar	13/06/1956	Do
4	13	Shaheen Akhtar	GGHSS Begum Shahab-Ud-Din	04/04/1955	Do
5	15	Atifa Begum	PGHSS Comprehensive	04/04/1959	Do
6	16	Shelima Bibi	GGHS Jogiwar	01/01/1964	Do
7	17	Nazma Akhtar	GGHS Sheikh Abad	06/09/1957	Do
8	21	Shabnum Nafae	GGMS Choght Pura	23/11/1973	Do
9	22	Tasleem Shah	GGMS Asia Park Peshawar	04/11/1971	Do
10	23	Nisbat Jan	GGCMS Tehkal-Bala	14/04/1968	Do
11	24	Ishrat Parveen	GGHS Nishtar Abad	10/07/1971	Do
12	25	Nushirat Sultan	GGHS Mian Gujar	01/01/1975	Do
13	26	Humera Naz	GGHSS Hayat Abad	28/03/1970	Do
14	27	Qamrouhisa	GGMS Adzal	01/11/1968	Do
15	28	Rahat Bibi	GGHS Tarnab Farm	01/05/1971	Do
16	30	Shazia Bibi	GGMS Daki Munnwar	02/01/1975	Do
17	32	Rehana Khatoon	GGMS Sattar Shah Col	09/07/1975	Do
18	33	Bibi Rozina	GGHSS Begum Shahab-Ud-Din	15/04/1972	Do

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J. Z. Khan

19	35	Shagbina	GGHS Gul Bahar	02/06/1974	Do
20	36	Saira Jabeen	GGMHS Nothia	26/10/1972	Do
21	37	Shagufa Naseer	GGHS Paf Shaheen Camp	28/03/1975	Do
22	38	Nighat Jehan	GGMS Achini Payan	15/04/1973	Do
23	39	Fouzia Sharif	GGHS Yaka Toot	01/10/1975	Do
24	40	Maryum Noor	GGMS Darmangi	30/09/1971	Do
25	41	Nabila Naz	GGHS No.1 Cantt	10/10/1970	Do
26	42	Safia Begum	GGHS Khyber Colony	02/11/1967	Do
27	43	Nishat	GGMS Malakandher	15/09/1965	Do
28	44	Farzana Shaheen	GGMS Zaryab Colony	16/04/1976	Do
29	45	Tahira Begum	GGHS University Town	20/02/1976	Do
30	46	Shazia Gul	GGHS Jogiwara	29/01/1974	Do
31	47	Saeeda Bano	GGMS Paklia Ghulum	15/03/1965	Do
32	48	Zeba	GGHS Nishtar Abad	29/09/1969	Do
33	49	Rubina Shaheen	GGHSS Comprehensive	01/06/1967	Do
34	50	Fozia Ambreen	GGMS Hazur Khwani No.2	11/3/1977	Do
35	51	Gul-E-Rania	GGHS Islamia Collegiate	05/02/1975	Do
36	52	Fozia Anjum	GGMS Shah Alam	10/11/1969	Do
37	53	Nadia Usbi	GGMS New Karim Pura	20/04/1978	Do
38	54	Sarwat Jehan	GGMS No.1 Cantt.	12/03/1976	Do
39	55	Shazid Nooran	GGHS Jogiwara	12/06/1972	Do

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Sa- similarity on lower post shall remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)

Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Encls: No. 4007-13 / File No.2/Promotion Senior DM B-16: Dated Peshawar the 21/07/2002

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officers (F) Peshawar.
3. District Accounts Officer Peshawar.
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

Dy: Director, Estab. (Female)
Elementary and Secondary Education
Peshawar

A. H. Khan

Anx-C

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OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE (E&S) EDUCATION PESHAWAR																	
Revised Tentative Seniority List of Female S.D.M Teachers of District Peshawar																	
Sr	School Name	Teacher Name	Father Name	Acad Qualif	Profe Qualif	Desig	BPS	DOB	Domicile District	Date of First Appointed	D/O taking over charge in Present Post	D/O passing Professional Exam	D/O Promotion to SDM Post	Date of taking over charge in this district passing	File Number of Consideration	File Name	21/02/2013 Sr.No of Seniority List
1	GGHS BUDHNI	SHABNUM NAFEEES	SYED GHULAM HABIB SHAH	BA	DM	SOM	16	23/11/1973	PESHAWAR	31/03/1995	01/03/1995	25/05/1996	21/02/2013	25/05/1996	21/02/2013	18	7
2	GGHS JOGIWARA	TASLEEM AKHTAR	SYED AKBAR SHAH	MA	MED	SOM	16	04/11/1971	PESHAWAR	28/08/1997	01/07/1997	25/06/1996	21/02/2013	01/07/1997	21/02/2013	18	8
3	GGHS Nishter Abad	ISHRAT PARVEEN	SYED PIR SAKHI SHAH	MA	MED	SOM	16	10/07/1971	PESHAWAR	18/03/1992	13/03/1992	25/06/1996	21/02/2013	25/06/1996	21/02/2013	18	9
4	GGHSS Hayat Abad	HUMERA NAZ	AMAN ULLAH KHAN	MA	BED	SOM	16	28/03/1970	PESHAWAR	31/10/1996	02/11/1996	14/06/1997	21/02/2013	14/06/1997	21/02/2013	18	12
5	GGHS BUDHNI	RAHAT BIBI	ARBAE MUIQBAL	BA	DM	SOM	16	01/05/1971	PESHAWAR	10/07/1997	01/03/1997	1996-96	21/02/2013	01/03/1997	21/02/2013	18	14
6	GGHS BASHIR ABAD	SHAZIA BIBI	KARIM ELAH	MA	MED	SOM	16	01/02/1976	PESHAWAR	25/07/1997	25/07/1997	25/07/1997	21/02/2013	30/06/1997	21/02/2013	18	15
7	GGHS BASHIR ABAD	SHAZIA BIBI	KARIM ELAH	MA	MED	SOM	16	01/02/1976	PESHAWAR	25/07/1997	25/07/1997	25/07/1997	21/02/2013	30/06/1997	21/02/2013	18	15
8	GGHS GUL BAHAR	SHABINA	MUHAMMAD HASHAM	MA	DM	SOM	16	02/06/1974	PESHAWAR	28/04/1997	01/07/1997	14/05/1997	21/02/2013	01/07/1997	21/02/2013	18	18
9	GGHSS BEGUM SHAHAB UD DIN	SAIRA JABEEN	FAZAL KARIM	BA	MED	SOM	16	28/10/1972	PESHAWAR	25/06/1997	01/07/1997	3094-96	21/02/2013	01/07/1997	21/02/2013	18	19
10	GGHSS BSD PESH	SHAGUFTA NASEER	NASEER AHMAD	MA	MED	SOM	16	28/03/1975	PESHAWAR	30/10/1996	01/07/1997	13/06/1997	21/02/2013	01/07/1997	21/02/2013	18	20
11	GGHS BASHIR ABAD	SHAZIA BIBI	KARIM ELAH	MA	MED	SOM	16	01/02/1976	PESHAWAR	25/07/1997	25/07/1997	25/07/1997	21/02/2013	30/06/1997	21/02/2013	18	21
12	GGHSS KHYSOPOLONY	SHAKIRA BIBI	GHULAM JAFFAR	MA	MED	SOM	16	21/05/1973	PESHAWAR	26/08/1997	06/07/1997	25/05/1996	21/02/2013	01/11/1996	21/02/2013	18	22
13	GGHS SHEKH ABAD	FOUZIA SHARIF	MUHAMAD SHARIF	MA	MED	SOM	16	01/10/1975	PESHAWAR	26/06/1997	06/07/1997	13/06/1997	21/02/2013	06/07/1997	21/02/2013	18	23
14	GGHS BARA LANE	MARYUM NOOR	NOOR MOHAMMAD	MA	MED	SOM	16	30/05/1971	PESHAWAR	17/07/1997	17/07/1997	30/08/1996	21/02/2013	17/07/1997	21/02/2013	18	24
15	GGHS Not. Clint	NABLA NAZ	ASHIQ SALEEN	MA	MED	SOM	16	10/10/1970	PESHAWAR	26/06/1997	22/07/1997	13/6/1997	21/02/2013	27/02/1998	21/02/2013	18	26
16	GGHSS LARAMA	SAFIA BEGUM	RAJ SERRAJ MUHAMMAD	BA	DM	SOM	16	02/11/1967	PESHAWAR	20/10/1993	24/10/1993	27/02/1998	21/02/2013	27/02/1998	21/02/2013	18	28
17	GGHS CITY RAIL STATION	FARZANA SHAHEEN	GHULAM YAHYA	MA	BED	SOM	16	18/04/1976	PESHAWAR	06/04/1999	06/04/1999	1996-97	21/02/2013	06/04/1999	21/02/2013	18	29
18	GGHSS UNI TOWN	TAHIRA BEGUM	ABDUL SHAKOOR	MA	MED	SOM	16	20/02/1976	PESHAWAR	06/04/1999	06/04/1999	1996-97	21/02/2013	06/04/1999	21/02/2013	18	33
19	GGHSS COMPREHENSIVE	RUBINA SHAHEEN	HAZARI BHATTI	MA	BED	SOM	16	01/06/1967	ABBOTTABAD	34/01/1991	28/01/1991	01/07/1990	21/02/2013	18/07/1989	21/02/2013	18	34
20	GGHS KAGA WALA	FOZIA AMREEN	AMIR KHAN	MA	BED	SOM	16	13/3/1977	PESHAWAR	09/12/1999	13/12/1999	1996-97	21/02/2013	13/12/1999	21/02/2013	18	36
21	GGHS KHAN MAST	FOZIA ANJUM	ABDUR RAHEEM	BA	DM	SOM	16	11/10/1969	PESHAWAR	14/12/1999	14/12/1999		21/02/2013	14/12/1999	21/02/2013	18	38
22	GGHSS BADABER PESH	SARWAT JEHAN	MAAZ KHAN	MA	MED	SOM	16	12/03/1976	PESHAWAR	09/12/1999	16/12/1999	06/11/1999	21/02/2013	16/12/1999	21/02/2013	18	39
23	GGHSS JOGIWARA	SHAZIA MOREEN	FAZALE KARIM	MA	BED	SOM	16	12/06/1972	PESHAWAR	09/12/1999	16/12/1999	11/06/1999	21/02/2013	16/12/1999	21/02/2013	18	

Fazal Khan

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE (E&S) EDUCATION PESHAWAR

Revised Tentative Seniority List of Female S.DM Teachers of District Peshawar

S#	School Name	Teacher Name	Father Name	Acad Qualif	Profe Qualif	Desig	BPS	DOB	Domicile District	Date of First Appointment	D/o taking over charge in present post	D/o Passing professional exam	D/o Promotion to SDM Post	Date of taking over charge in this district passing	Date of consideration	21.02.2010 S No of Seniority List
1	GGHS Budhni	Shabnum Nafees	Syed Ghulam Habib Shah	Ba	DM	SDM	16	23.11.73	Peshawar	31.08.95	01.9.95	25.05.96	21.02.13	25.05.96	21.02.13	7
2	GGHS Jogiwarra	Tasleem Akhtar	Syed Akbar Shah	MA	MED	SDM	16	04.11.71	Peshawar	28.06.97	01.07.97	25.05.96	21.02.13	01.07.97	21.02.13	8
3	GGHS Nishtar Abad	Ishrat Parveen	Syed Pir Sakhi Shah	MA	MED	SDM	16	10.07.71	Peshawar	18.03.92	19.03.92	25.05.96	21.02.13	25.05.96	21.02.13	10
4	GGHS Hayat Abad	Humera Naz	Aman Ullah Khan	MA	BED	SDM	16	28.03.70	Peshawar	21.10.96	02.11.96	14.05.97	21.02.13	14.05.97	21.02.13	12
5	GGHS Budhni	Rahat Bibi	Arbab M. Iqbal	BA	DM	SDM	16	01.05.71	Peshawar	10.07.97	01.09.97	1995-96	21.02.13	01.09.97	21.02.13	14
6	GGHS Bashir Abad	Shazia Bibi	Karam Elahi	MA	MED	SDM	16	01.02.75	Peshawar	26.06.97	30.03.97	13.06.97	21.02.13	30.06.97	21.02.13	15
7	GGCMHS Nothia	Rehana Khatoon	Habib ur Rehman	MA	BED	SDM	16	09.07.75	Peshawar	09.08.97	16.08.97	25.05.96	21.02.13	16.08.97	21.02.13	16
8	GGHS Gul Bahar	Shabina	Muhammad Hasham	MA	DM	SDM	16	02.06.74	Peshawar	26.06.97	01.07.97	14.05.97	21.02.13	01.07.97	21.02.13	18
9	GGHSS Begum Shahab ud Din	Saira Jabeen	Fazal Karim	BA	MED	SDM	16	26.10.72	Peshawar	26.06.97	01.07.97	1994-95	21.02.13	01.07.97	21.02.13	19
10	GGHSS BSD Pesh	Shagufta Naseer	Naseer Ahmad	MA	MED	SDM	16	28.03.75	Peshawar	30.10.96	01.07.97	13.05.97	21.02.13	01.07.97	21.02.13	20
11	GGHS Achini Payan	Nighat Jabeen	Misri Khan	MA	MED	SDM	16	15.04.73	Peshawar	03.09.96	05.09.96	14.05.97	21.02.13	14.05.97	21.02.13	21
12	GGHSS Khyber Colony	Shakira Bibi	Ghulam Jaffar	MA	MED	SDM	16	21.05.73	Peshawar	26.06.97	05.07.97	25.05.96	21.02.13	01.11.98	21.02.13	22
13	GGHS Sheikh Abad	Fouzia Sharif	Muhammad Sharif	MA	MED	SDM	16	01.10.75	Peshawar	26.06.97	17.07.97	13.05.97	21.02.13	05.07.97	21.02.13	23
14	GGHS Bara Lane	Maryum Noor	Noor Muhammad	MA	MED	SDM	16	30.09.71	Peshawar	17.07.97	22.7.97	30.08.96	21.02.13	17.07.97	21.02.13	24
15	GGHS No 1 Cantt	Nabila Naz	Ashiq Saleem	MA	MED	SDM	16	10.10.70	Peshawar	26.06.97	24.10.93	13.05.97	21.02.13	22.07.97	21.02.13	25
16	GGHSS Larama	Safia Begum	Haji Sirraj Muhammad	BA	DM	SDM	16	02.11.67	Peshawar	20.10.93	06.04.99	27.02.98	21.02.13	27.02.98	21.02.13	26
17	GGHS City Rai Station	Farzana Shaheen	Ghulam Yahya	MA	BED	SDM	16	16.04.76	Peshawar	06.04.99	08.04.99	1996-97	21.02.13	06.04.99	21.02.13	28
18	GGHS Uni Town	Tahira Begum	Abdul Shakoor	MA	MED	SDM	16	20.02.76	Peshawar	06.04.99	28.01.91	1996-97	21.02.13	8.04.99	21.02.13	29
19	GGHSS Comprehensive	Rubina Shaheen	Hazari Bhatti	MA	BED	SDM	16	01.06.67	Peshawar	24.01.91	13.12.99	01.07.90	21.02.13	18.07.99	21.02.13	33
20	GGHS Kaga Wala	Fozia Ambreen	Amir Khan	MA	BED	SDM	16	13.03.77	Peshawar	09.12.99	14.12.99	1996-97	21.02.13	13.12.99	21.02.13	34
21	GGHS Khan Mast	Fozia Anjum	Abdur Raheem	BA	DM	SDM	16	11.10.67	Peshawar	14.12.99	06.12.99		21.02.13	14.12.99	21.02.13	36
22	GGHSS Badhber Pesh	Sarwat Jehan	Maaz Khan	MA	MED	SDM	16	12.03.76	Peshawar	09.12.99	16.12.99	05.11.99	21.02.13	16.12.99	21.02.13	38
23	GGHS Jogiwarra	Shahzia Noreen	Fazle Karim	MA	BED	SDM	16	12.06.72	Peshawar	09.12.99	16.12.99	11.05.99	21.02.13	16.12.99	21.02.13	39

The District Education Officer (Female),
District Peshawar.

Amir
G.I

19

Subject: **CORRECTION IN TENTATIVE SENIORITY LIST OF FEMALE SENIOR DRAWING MASTER TEACHERS OF DISTRICT PESHAWAR**

I would like to bring in your kind notice that I have been appointed as drawing Master (DM) Vide Notification No. 9857-9917 /11, dated 26/06/1997 (Annuxure-1) and assumed the charge at GGMS MALOGO Peshawar on 26/06/1997 as per Notification (Copy of the service book Annuxure-2). As per DM Notification on 26/06/1997 my Serial No. is 06 and Shazia Bibi is at Sr. No. 15 in the seniority list. However as per DM Notification my merit list No. is 04 & Marks are 53 that is 04/53 (Reference column No. 04). While Shazia Bibi is at Sr. No. 15 in merit list & her Marks are 45 that is 15/45 (Reference column No. 04, Annuxure-01). We have been promoted to Senior DM on 21/02/2013 Vide Notification No. 4007-13/file NO.2/Promotion Senior DM BPS-16, dated 21/02/2013 (Annuxure-3) but my name has been placed at serial No. 11 & Shazia bibi at Serial No. 6 both in the Seniority List of the Senior DM and the new seniority list for promotion.

Therefore it is requested that Correction in the seniority list of Senior DM and the new seniority list for promotion may please be corrected on the following grounds.

1. Date of first appointment of both officers are the same that is 26/06/1997 as per notification (Annuxure-1)
2. Date of taking over charge as DM are different:
 - i. Nighat Jehan D/O Misry Khan 26/06/1997 (Service Book Annuxure-2)
 - ii. Shazia Bibi D/O Karam Elahi 30/06/1997 (As per new seniority list)
3. My age is 2-year and 2- months more than Shazia Bibi according to our Date of Birth
 - i. DOB Shazia Bibi D/O Karam Elahi 01/02/1975 (As per new seniority list)
 - ii. DOB Nighat Jehan D/O Misry Khan 15/04/1973 (As per new seniority list)
4. Date of taking over charge in Peshawar District
 - i. Shazia Bibi D/O Karam Elahi 30/06/1997 (As per new seniority list)
 - ii. Nighat Jehan D/O Misry Khan 26/06/1997 (As per new seniority list)

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~~Sh~~
12/12/19

Received document
and along with
S/Boys ~~Sh~~
07/01/2020

Attested
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5. Date of passing professional examination are the same :

- i. Shazia Bibi D/O Karam Elahi 13/05/1997
- ii. Nighat Jehan D/O Misri Khan 13/05/1997

Similarly RAHAT BIBI D/O ARBAB M. IQBAL CGHS BUDHNI is at serial No.05 in the seniority list (F/M) SDM District Peshawar & in the new seniority list for promotion is also junior to me on the following grounds.

> Rahat Bibi D/O Arbab M. Iqbal Date Of first Appointment is 10/07/1997 (As per new seniority list)

~~_____~~

> Date of Taking over charge (Rahat Bibi) at present post as (DM) 01/09/97 (As per new seniority list)

~~_____~~

> Date of taking over charge (Rahat Bibi) at Peshawar District (DM) 01/09/97 (As per new seniority list)

~~_____~~

In the light of the above facts & figures it is requested that I may please be placed at my correct position in both seniority lists.

N. Nighat

Mrs. Nighat Jehan D/o Misri Khan
W/o Prof. Engr. Noor Ul Qamar
SDM Achini Payan Peshawar.

Assisted

ITEM NO.4 PROMOTION OF ED/TEACHERS (G) ON BASIS OF MERIT

S. No.	Name of Official	Present Place of Posting	Patrol School	Remarks
1	[Name]	[Place]	[School]	[Remarks]

ITEM NO.5 PROMOTION OF TEACHERS (G) ON BASIS OF MERIT

S. No.	Name of Official	Present Place of Posting	Patrol School	Remarks
1	Anjumazam	GGPS Ghalib	GGPS Ghalib	[Remarks]

ITEM NO.6 PROMOTION OF TEACHERS (G) ON BASIS OF MERIT

S. No.	Name of Official	Present Place of Posting	Patrol School	Remarks
1	Bibi Shagufta	GGPS Shak	GGPS Shak	[Remarks]

ITEM NO.7 PROMOTION OF TEACHERS (G) ON BASIS OF MERIT

S. No.	Name of Official	Present Place of Posting	Patrol School	Remarks
1	Nazia	GGPS Ghalib Colony Dina	GGPS Dina Colony	[Remarks]
2	Farida Begum	GGPS [Name]	GGPS [Name]	[Remarks]
3	Salma Imtiaz	GGPS [Name]	GGPS [Name]	[Remarks]
4	Tahira Jehan	GGPS [Name]	GGPS [Name]	[Remarks]
5	Shabana Samin	GGPS [Name]	GGPS [Name]	[Remarks]

Copy **ITEM NO.8 CONSEQUENTIAL TRANSFERS**
 (Consequent upon above)

S. No.	Name of Official	Present Place of Posting	Patrol School	Remarks
1	Rubee Wahid	GGPS [Name]	GGPS [Name]	[Remarks]
2	Kausar	GGPS [Name]	GGPS [Name]	[Remarks]
3	Nargis	GGPS [Name]	GGPS [Name]	[Remarks]
4	Shemsa	GGPS [Name]	GGPS [Name]	[Remarks]
5	Dirina	GGPS [Name]	GGPS [Name]	[Remarks]

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6. No TA/DA is allowed for joining their duty.
7. They will give an under taking to be recorded and if they are wrongly promoted they will be reversed.
8. Before handling over charge once again their documents may be checked if they have not the required relevant qualifications as per rules. They may not be lunded over charge of the post.

DY. DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

Endst.No. 650-83 Dated 11-1 2022

Copy for information and necessary action to (he):-

1. Accountant General, Khyber Pakhtunkhwa Peshawar.
2. Director of Elementary & Secondary Education Khyber-Pakhtunkhwa Peshawar
3. District Accounts Officer, Peshawar.
4. PS to the Secretary to Govt. Khyber Pakhtunkhwa Ed&SE Department Peshawar.
5. All Principals/Head Mistresses Concerned.
6. Teachers Concerned.
7. Master file.

DY. DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

Attested
B



(FEMALE) PESHAWAR.

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NOTIFICATION:

Consequent upon the Placement of Services at the Disposal of this office by the Director (E & SE) Khyber Pakhtunkhwa vide Notification No. 1130-35/A-1/OPC-2019/KPK Dated: 03/01/2021, the competent authority is pleased to adjust the following SSTs against the vacant posts in the schools mentioned against each their names in the interest of public service with immediate effect on the terms and conditions already framed in the above mentioned Notification.

S.No	Name of Official	Present Place of Posting	Adjusted at	Remarks
01	Chand Bibi	GGCMS Tektal Bal	GGHSS Mathra	A.V.P
02	Zehar Begum	GGHS Sherkh Abad	GGHS Lala Kili	A.V.P
03	Bibi Raziya	GGHSS No.2 Cantt	GGHS Pakha Ghulam	A.V.P
04	Umera Gul	GGHSS No.2 Cantt	GGHS Pakha Ghulam	A.V.P
05	Nuzrat Sereen	GGHSS No.2 Cantt	GGMS Gura Tajik	A.V.P
06	Nazafar Shahzad	GGHS Achini Payan	GGMS Mamani	A.V.P
07	Zakia Sabir	GGHS Achini Payan	GGMS Marhokhel	A.V.P
08	Sadia Bibi	GGHSS Bashir Abad	GGHS Khappa	A.V.P
09	Samina Gul	GGHS Achini Payan	GGHS Azakhel	A.V.P
10	Inara Ambreen	GGPS Old Karim Pur	GGHS Dara Lare	A.V.P
11	Shafiqat Begum	GGPS Gura Fazl-e-Rahim	GGCMS Qilla Shah Muhammad	A.V.P

(SAMINA GRANI)
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

No. 5360-761 Dated Pesh: the 11 / 01 / 2021.

Accountant General Khyber Pakhtun Khwa Peshawar.
Director Elementary & Secondary Education Khyber Pakhtun Khwa Peshawar.
District Monitoring Officer, IMU Peshawar.
Principals / Headmistresses Concerned.
Teachers Concerned.
Cashier Local Offices.

[Signature]
Head Mistress
G.G.H.S Mac... G...

Amended

[Signature]
DY. DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

Anx - E

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To

1. The Secretary Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary and Secondary Education
Peshawar.
3. The District Education Officer (Female)
District, Peshawar.

Through: **Proper Channel**

Subject: **CORRECTION IN THE SENIORITY LIST OF FEMALE SENIOR DRAWING
MASTER (SDM) TEACHERS OF DISTRICT PESHAWAR**

R/Sir,

Reference is made of the application submitted in the DEO Office (F/M) on the subject matter along with relative documents and service Book on 12/12/2019 in the District Education Office (female) Peshawar (Copy Enclosed) but the reply is still awaited on the subject matter (Annexure-1). The details are as under:

A. I would like to bring in your kind notice that I have been appointed as CT BPS-9 Vide Notification No. 2530, dated 03/09/1996 (Annexure-2) and assumed the charge at G.G.H.S BADABER Dated 05/09/1996 (Charge report attached for ready reference Annexure-3).

B. I have been appointed as Drawing Master (DM) Vide Notification, No. 9857-9917/11, dated 26/06/1997 (Annexure-4) and assumed the charge at GGMS MALOGO Peshawar (charge report is attached as annexure -5). In the said Notification issued by Divl. Directorate of Education School Peshawar, Division Peshawar on 26/06/1997, my Serial No. was **06** while REHANA KHATOON D/O HABIB UR REHMAN at Sr. No. 11 and SHAZIA BIBI at Sr. No. 15 were **junior to me**.

It is further added that we have been promoted to Senior Drawing Master (SDM) Posts on the same date Vide Notification No. 4007-13/file N0.2/Promotion Senior DM BPS-16, dated 21/02/2012 (Annexure-6). However, in this notification, my name has been placed at serial No.22, declaring me junior to Shazia Bibi D/O Karam Ilahi at S.No 16 and Rehana Khatoon D/O Habib urRehaman at S.NO 17 who are actually juniors according to above Notification No.9857-9917/11, dated 26/06/1997 (Annexure-4). Furthermore, SHAZIA BIBI has been promoted on SST Post in 2020-21, ignoring me in the seniority list and the same was kept secret and I came across the same, when I got information regarding the promotion order of Mst: Rehana Khatun. In this regard, I have already submitted application for the correction of seniority list on 12/12/2019 in the District Education Office (female) Peshawar (Annexure-1) but the reply is still awaited.

Accepted
Peshawar

C. Now this time again, I have been ignored for the promotion to the post of SST and REHANA KHATOON S/O HABIB UR REHMAN who was junior to me was promoted to SST Post vide notification no. 650-83, dated 11/01/2022 (Annexure-7).

D: Date of first appointment of the officers are:

- i. NighatJehan D/O Misry Khan 05/09/1996
- ii. Rehana Khatoon D/O Habib ur Rehman 09/08/1997
- iii. Shazia Bibi D/O Karam Ilahi 26/06/1997

E: Date of promotion of the Officers as S.DM (Female) vide Notification No4007-12

Dated 21/02/2012(Annexure-6) are the same:

- i. NighatJehan D/O Misry Khan 21/02/2012
- ii. Rehana Khatoon D/O Habib ur Rehman 21/02/2012
- iii. Shazia Bibi D/O Karam Ilahi 21/02/2012

F. Date of taking over charge as SDM in Peshawar District (Annexure-8):

- i. NighatJehan D/O Misry Khan 14/05/1997 (As per senior list)
- ii. Rehana Khatoon D/O Habib ur Rehman 16/08/1997 (As per senior list)
- iii. Shazia Bibi D/O Karam Ilahi 30/06/1997 (As per senior list)

G. My age is more than Rehana Khatoon & Shazia Bibi as per our Date of Birth:

- | | |
|---|------------|
| i. DOB of NighatJehan D/O Misry Khan | 15/04/1973 |
| ii. DOB of Rehana Khatoon D/O Habib ur Rehman | 09/07/1975 |
| iii. DOB of Shazia Bibi D/O Karam Ilahi | 01/02/1975 |

H. Professional Qualification:

- | | |
|--|------------|
| i. NighatJehan D/O Misry Khan | (MED & MA) |
| ii. Rehana khatoon D/O Habib ur Rehman | (BED & MA) |
| iii. Shazia Bibi D/O Karam Ilahi | (MED & MA) |

In the light of the above facts & figures it is requested that fresh final seniority list may be notified and circulated by granting me senior position and be placed at my correct position in the Seniority lists (Before SHAZIA BIBI and REHANA KHATOON) and promote me to the post of SST (G) with effect from date when junior to me have been promoted with all back benefits.

NighatJehan

19/3/2022

Yours Obediently,

Diary no 2108 Mrs. NighatJehan D/o Misri Khan
Dated 15/3/22 W/O Prof. Engr. Noor Ul Qamar
SDM, Achini Payan, Peshawar.

Atsfd
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WAKALAT NAMA

IN THE COURT OF The Khyber Pakhtunkhwa

Service Tribunal Peshawar

Nighat Jehan Appellant(s)/Petitioner(s)

VERSUS

The Secretary (ESSE)

KOK Peshawar & others Respondent(s)

I/We _____ do hereby appoint
Mr. Khush Dil Khan, Advocate Supreme Court of Pakistan in the above
mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this _____

Attested & Accepted by

A Jehan ✓
Signature of Executants

Khush Dil Khan,
Advocate,
Supreme Court of Pakistan
9-B, Haroon Mansion
Off: Tel: 091-2213445

اشرف علی خٹاک
Ashraf Ali Khattak
ASC
B.C # 1046-05
Cell # 0332-9931676

Sadia Uman
Sadia Uman
Advocate.

Ali Bakht Advocate
Ali Bakht