

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.**

**Service Appeal No. 7211/2021**

BEFORE: MR. KALIM ARSHAD KHAN, ... CHAIRMAN  
MISS. FAREEHA PAUL, ... MEMBER(E)

**Mst. Shaheen** D/O Fatih Rahman, Certified Teacher (BS-15) GGMS Bandagai  
Dir Lower Khyber Pakhtunkhwa.

..... (*Appellant*)

Versus

1. The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (F), District Dir Lower.
4. Mst. Hafsa Bibi (GGHS Khazana) District Dir Lower and 4 others.

.....(*Respondents*)

Mr. Shamsul Hadi, ... For appellant  
Advocate

Mr. Kabirullah Khattak, ... For respondents.  
Addl. Advocate General

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Date of Institution.....23.06.2020

Date of Hearing.....01.11.2022

Date of Decision..... 01.11.2022

**ORDER.**

**KALIM ARSHAD KHAN, CHAIRMAN.** Counsel for the appellant present.

Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Muhammad Usman, ADEO (Litigation) for the respondents present. Private respondents have already been placed ex-parte.

2. Through this single order shall dispose of the instant service appeal as well as connected Service Appeal No. 7217/2021, titled "Mst. Kausar Jehan Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others",



Service Appeal No. 7224/2020, titled "Mst. Shahida Bibi Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7229/2020, titled "Mst. Tajul Haram Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7230/2021, titled "Mst. Ishrat Nishad Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7235/2021, titled "Mst. Alia Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7236/2021, titled "Mst. Shehnaz Vs. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7237/2021, Mst. Walayat Ranra Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7238/2021, titled "Kawsar Anjum Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7239/2021, titled "Mst. Fatma Bibi Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7240/2021, titled "Noor Shahida Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7241/2021, titled "Mst. Habiba Rehman Vs. Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and others", and Service Appeal No. 7242/2021, titled "Mst. Shabina Bibi Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", as all the appeals are against the same impugned order dated 13.02.2020.

3. At the very outset, learned counsel for the appellants submits that the appellants have been promoted vide office order bearing Endst. No. 12-16, dated 06.10.2022, and the only grievance of the appellants was determination of their



01.11.22

seniority. The seniority list has not been placed on file by either side. The learned counsel for the appellants submits that the appellants would be satisfied if they are permitted to make an application to the respondent/department for supply of seniority list. Thereafter if they felt aggrieved they would resort to legal proceedings to get their grievance redressed, he added.

4. The appeals are disposed of with the observations that the appellants may make application to the respondent/department for supply of latest final/notified seniority and in case appellant(s) is/are aggrieved of the same they may resort to the legal proceedings to get their grievance redressed. On making application by the appellant(s) the department shall provide the list within 15 days. Cost shall follow the events. Consign.

5. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal this 1st day of November, 2022.*



(KALIM ARSHAD KHAN)  
Chairman



(FAREEHA PAUL)  
Member (E)


7  
ORDER

1<sup>st</sup> Nov., 2022

01. Mr. Shamsul Hadi Advocate for appellant present. Mr. Muhammad Adeel Butt, Addl. Advocate General alongwith Mr. Muhammad Usman, ADEO (Litigation) for the respondents present.

02. Vide our detailed order of today, placed on file, the appeal is disposed of with the observations that the appellant may make application to the respondent/department for supply of latest final/notified seniority and in case appellant is aggrieved of the same he may resort to the legal proceedings to get his grievance redressed. On making application by the appellant, the department shall provide the list within 15 days. Cost shall follow the events. Consign.

03. **Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 1st day of November, 2022.**

  
(Fargeha Paul)  
Member (E)

  
(Kalim Arshad Khan)  
Chairman



**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.**

**Service Appeal No. 7211/2021**

BEFORE: MR. KALIM ARSHAD KHAN, ... CHAIRMAN  
MISS. FAREEHA PAUL, ... MEMBER(E)

**Mst. Shaheen** D/O Fatih Rahman, Certified Teacher (BS-15) GGMS Bandagai  
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..... (*Appellant*)

Versus

1. The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
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3. The District Education Officer (F), District Dir Lower.
4. Mst. Hafsa Bibi (GGHS Khazana) District Dir Lower and 4 others.

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Date of Institution.....23.06.2020  
Date of Hearing.....01.11.2022  
Date of Decision..... 01.11.2022

**ORDER.**

**KALIM ARSHAD KHAN, CHAIRMAN.** Counsel for the appellant present.

Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Muhammad Usman, ADEO (Litigation) for the respondents present. Private respondents have already been placed ex-parte.

2. Through this single order shall dispose of the instant service appeal as well as connected Service Appeal No. 7217/2021, titled "Mst. Kausar Jehan Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others",

Service Appeal No. 7224/2020, titled "Mst. Shahida Bibi Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7229/2020, titled "Mst. Tajul Haram Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7230/2021, titled "Mst. Ishrat Nishad Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7235/2021, titled "Mst. Alia Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7236/2021, titled "Mst. Shehnaz Vs. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7237/2021, Mst. Walayat Ranra Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7238/2021, titled "Kawsar Anjum Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7239/2021, titled "Mst. Fatma Bibi Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7240/2021, titled "Noor Shahida Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", Service Appeal No. 7241/2021, titled "Mst. Habiba Rehman Vs. Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar and others", and Service Appeal No. 7242/2021, titled "Mst. Shabina Bibi Vs. the Secretary (E&SE) Department Khyber Pakhtunkhwa, Peshawar and others", as all the appeals are against the same impugned order dated 13.02.2020.

3. At the very outset, learned counsel for the appellants submits that the appellants have been promoted vide office order bearing Endst. No. 12-16, dated 06.10.2022 and the only grievance of the appellants was determination of their

seniority. The seniority list has not been placed on file by either side, and The learned counsel for the appellants submits that the appellants would be satisfied if they are permitted to make an application to the respondent/department for supply of seniority list. Thereafter if they felt aggrieved they would resort to legal proceedings to get their grievance redressed, *he added*

4. The appeals are disposed of with the observations that the appellants may make application to the respondent/department for supply of latest final/notified seniority and in case appellant(s) is/are aggrieved <sup>of</sup> ~~from~~ the same they may resort to the legal proceedings to get their grievance redressed. On making application by the appellant(s) the department shall provide the list within 15 days. Cost shall follow the events. Consign.

5. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal this 1st day of November, 2022.*

**(KALIM ARSHAD KHAN)**  
Chairman

**(FAREEHA PAUL)**  
Member (E)



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F)  
DISTRICT DIR LOWER

Tel: 09459250083  
FAX# 0945824083  
Email: emisdeofdirlower@gmail.com


**OFFICE ORDER**

Consequent upon the promotion of CTs, ATs, TTs, Female B-15 to SCTs, SATs, STTs Female B-16 on regular basis as notified by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Notification issued vide Endst. No.1311-15 /A-17/DPC-2021/Dir Lower Dated Peshawar the 31/12/2021. The following Female Teachers are here by adjusted/ Posted in the schools mentioned against their names.

**1. PROMOTION OF CTs TO THE POST OF SCT B-16**

S.No	Name of Teacher(SCTs)	BPS	Present Station	Place Of Posting	Remarks
1.	ALIZBAT HAYAT	16	GGHSS MUNDA	GGHSS MUNDA	Already Occupied
2.	NIZAKAT BIBI	16	GGHS BAJAWRO	GGHS BAJAWRO	Already Occupied
3.	FAZILAT BEGUM	16	GGMS KHUNGI	GGCMHS TIMERGARA	A.V. Post
4.	REHANA YASMIN	16	GGMS BANR OUCH	GGHSS ASBANR	A.V. Post
5.	TABASUM NAZ	16	GGMS QAZAI ABAD	GGCMHS TIMERGARA	A.V. Post
6.	FATIMA BIBI	16	GGMS SOGHALAI	GGHSS ZAIRAT TALASH	A.V. Post
7.	FARHANA BIBI	16	GGMS BANR OUCH	GGHSS ASBANR	A.V. Post
8.	NAJMA	16	GGHS HAJIABAD	GGHS HAJIABAD	Already Occupied
9.	WALAYAT RAHA	16	GGMS BANDAGI TALASH	GGHS SHAMSHIKHAN	A.V. Post
10.	NAZISH BEGUM	16	GGMS QAZAI ABAD	GGCMHS TIMERGARA	A.V. Post
11.	NAZ BEGUM	16	GGHS SALIGRAM	GGHS SALIGRAM	Already Occupied
12.	SOHIL BEGUM	16	GGHS PAITO DARA	GGHS PAITO DARA	Already Occupied
13.	NOOR JEHAN	16	GGHS BANRGAY TALASH	GGHS BANRGAY TALASH	Already Occupied
14.	TAJ UL HARAM	16	GGMS BANDAGI TALASH	GGHSS ZAIRAT TALASH	A.V. Post
15.	NOOR SHAHIDA	16	GGHS SHAMSHI KHAN	GGHSS ZAIRAT TALASH	A.V. Post
16.	SHAHIDA BIBI	16	GGHS BAJAWRO	GGHS BAJAWRO	Already Occupied
17.	SADAQAT SHAHRYAR	16	GGHS ODIRGRAM	GGHS ODIRGRAM	Already Occupied
18.	FALAK NAZ	16	GGMS MENA OUCH	GGHS BAGH KANDI	A.V. Post
19.	HIMAYAT BEGUM	16	GGHS MANYAL	GGHS MANYAL	Already Occupied
20.	MUSARAT BEGUM	16	GGHS KHAN ABAD DUKRAI	GGHS KHAN ABAD DUKRAI	Already Occupied
21.	ABIDA BEGUM	16	GGHS KHAIR ABAD	GGHS KHAIR ABAD	Already Occupied
22.	FAHMIDA BIBI	16	GGHSS PETO DARA	GGHSS PETO DARA	Already Occupied
23.	KALSOOM BEGUM	16	GGCMHS TIMERGARA	GGCMHS TIMERGARA	Already Occupied
24.	SHAMSHAD BEGUM	16	GGHS NARA TANGAI	GGHS NARA TANGAI	Already Occupied
25.	NARGAS BEGUM	16	GGCMHS TIMERGARA	GGCMHS TIMERGARA	Already Occupied
26.	ZUHRA BEGUM	16	GGMS DARO MAIDAN	GGHSS KUMBER	A.V. Post
27.	NOOR UL HUDA	16	GGHS SHER KHANI	GGHS SHER KHANI	Already Occupied
28.	MUSRAT	16	GGHSS KITYARI	GGHSS KITYARI	Already Occupied
29.	SHAMIM AKHTAR	16	GGHS JANGO	GGHS JANGO	Already Occupied
30.	ASIA BIBI	16	GGHS WARSAK	GGHS WARSAK	Already Occupied
31.	KAUSAR JEHAN	16	GGHS KHAZANA	GGHSS SADDO	A.V. Post

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**PRINCIPAL**  
GGHSS Saddo  
Distt Dir Lower



32.	FARZANA	16	GGHSS SHAWA	GGHSS SHAWA	Already Occupied
33.	AMINA BIBI	16	GGHS DANWA	GGHS DANWA	Already Occupied
34.	GOHAR BEGUM	16	GGHSS KUMBAR	GGHSS KUMBAR	Already Occupied
35.	SHAHNILA	16	GGHSS KHADAGZAI	GGHSS KHADAGZAI	Already Occupied
36.	KAUSAR BIBI	16	GGHS KHANPUR	GGHSS ASBANR	A.V. Post
37.	GULZAR BEGUM	16	GGCMHS TIMERGARA	GGCMHS TIMERGARA	Already Occupied
38.	SARWAT JABEEN	16	GGHS ODIRGRAM	GGHS ODIRGRAM	Already Occupied
39.	MARYAM BEGUM	16	GGHS KHAN ABAD	GGHS KHAN ABAD	Already Occupied
40.	FUZAI RASHID	16	GGHS BANDA TALASH	GGHS BANDA TALASH	Already Occupied
41.	SHABNAM ARA	16	GGHSS OUCH	GGHSS OUCH	Already Occupied
42.	ALIA BEGUM	16	GGMS SARAI BALA	GGHSS ZAIRAT TALASH	A.V. Post
43.	SAMIA BIBI	16	GGMS DARAMAL BALA	GGHS NARY TANGY	A.V. Post
44.	NAJMA BEGUM	16	GGHS HAYA SERAI	GGHS HAYA SERAI	Already Occupied
45.	NASREEN NOOR	16	GGHSS SAMAR BAGH	GGHSS SAMAR BAGH	Already Occupied
46.	FARAS BEGUM	16	GGMS SHAGAI MAIDAN	GGHS ZAIMDARA	A.V. Post
47.	NIGHAT SEEMA	16	GGHSS KITYARI	GGHSS KITYARI	Already Occupied
48.	SALMA BIBI	16	GGHSS KOTO	GGHSS KOTO	Already Occupied
49.	NAGINA RAHAM DIL	16	GGMS MENA BATAN	GGHSS ASBNAR	A.V. Post
50.	SAHBINA NISHAD	16	GGHS BANRGAY TALASH	GGHS BANRGAY TALASH	Already Occupied
51.	ISHRAT NISHAD	16	GGHS SHAMSHI KHAN	GGHS SHAMSHI KHAN	A.V. Post
52.	NASIM BEGUM	16	GGMS SHAGAI	GGHS KHAN ABAD	A.V. Post
53.	MEHNAZ SUBHAN	16	GGHSS CHAKDARA	GGHSS CHAKDARA	Already Occupied
54.	SHABANA BEGUM	16	GGMS SAYAR QALAGAI	GGHSS RABAT	A.V. Post
55.	ZAR BEGUM	16	GGMS AJOO TALASH	GGHSS NAGRAI PAYEEN	A.V. Post
56.	IQBAL BEGUM	16	GGHS MANYAL	GGHS MANYAL	Already Occupied
57.	RASHIDA BEGUM	16	GGHSS KUMBAR	GGHSS KUMBAR	Already Occupied
58.	ZEENAT BEGUM	16	GGHS KADH	GGHS KADH	Already Occupied
59.	SHAHNAZ BEGUM	16	GGMS SARAI BALA	GGHS SHAMSHIKHAN	A.V. Post
60.	SHABNAM BEGUM	16	GGHS KOTKAY PAYEEKHEL	GGHS KOTKAY PAYEEKHEL	Already Occupied
61.	FARIDA BIBI	16	GGHSS NAGRI PAYEEN	GGHSS NAGRI PAYEEN	Already Occupied
62.	HABIBA REHMAN	16	GGMS SOGHALY	GGHS BANRGAY TALASH	A.V. Post
63.	SHEHLA ISLAM	16	GGHSS KHADAGZAI	GGHSS KHADAGZAI	Already Occupied
64.	RUKHSANA BIBI	16	GGHSS KOTO	GGHSS KOTO	Already Occupied
65.	SAEEDA NAZ	16	GGHS BISHEGRAM	GGHS BISHEGRAM	Already Occupied
66.	SEEMA BAKHAT	16	GGMS KHEMA	GGHS KANDARO	A.V. Post
67.	NARGIS ZADA	16	GGMS CHAT PAT	GGHS DARA RAMORA	A.V. Post
68.	MENHAJ BEGUM	16	GGMS AJOO TALASH	GGHSS NAGRI PAYEEN	A.V. Post
69.	SARWAT BIBI	16	GGMS MENA OUCH	GGHS JANGO	A.V. Post
70.	NOORUL HUDA	16	GGMS KOTKAY MAIDAN	GGHS KHAN ABAD	A.V. Post
71.	MARYAM BIBI	16	GGHS KHAL PAYAN	GGHSS RABAT	A.V. Post
72.	SHAHEEN BEGUM	16	GGMS BANDAGAI	GGHS SHAMSHIKHAN	A.V. Post
73.	SHAHIDA PARVEEN	16	GGHSS SHAWA	GGHSS SHAWA	Already Occupied

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**PRINCIPAL**  
 GGHSS Saddo  
 Distt Dir Lower

74.	MENHAS BEGUM	16	GGMS ASSIGAY	GGHS SALIGRAM	A.V. Post
75.	ZEENAT BEGUM	16	GGHS BAJAWRO	GGHS BAJAWRO	Already Occupied
76.	ASMA MALIK	16	GGMS KHEMA	GGHS KANDARO	A.V. Post
77.	NIZAKAT BIBI	16	GGMS KHEMA	GGHS KHAZANA	A.V. Post
78.	RAZIA BIBI	16	GGHSS KOTO	GGHSS KOTO	Already Occupied
79.	GUL HIDA	16	GGHS HAYA SERAI	GGHS HAYA SERAI	Already Occupied
80.	FAHMEEDA BIBI	16	GGHS SHER KHANI	GGHS SHER KHANI	Already Occupied
81.	SHAGUFTA BEGUM	16	GGMS SHAGAI MAIDAN	GGHS KHAN ABAD	A.V. Post
82.	NAGEENA NAZ	16	GGHSS SAMAR BAGH	GGHSS SAMAR BAGH	Already Occupied
83.	MUZILFAT ARA	16	GGHSS ASBANR	GGHSS ASBANR	Already Occupied
84.	BIBI ZANAIB	16	GGHS WARSAK	GGHS WARSAK	Already Occupied
85.	TASLEEM BEGUM	16	GGMS KOTKAY MAIDAN	GGHS KHAN ABAD	A.V. Post
86.	TAJ UL HARAM	16	GGHS BAJAWRO	GGHS BAJAWRO	Already Occupied
87.	NAVEED AKHTAR	16	GGHSS ASBANR	GGHSS ASBANR	Already Occupied
88.	SHAHI GUL	16	GGHS DAG GOSAM	GGHS DAG GOSAM	Already Occupied
89.	JAMHURIA	16	GGHS MORANAI	GGHS MORANAI	Already Occupied
90.	TAWHEED BEGUM	16	GGHS HAJIABAD	GGHS HAJIABAD	Already Occupied
91.	YASMIN BIBI	16	GGCMHS TIMERGARA	GGCMHS TIMERGARA	Already Occupied
92.	SAHULAT BEGUM	16	GGHS KHAN ABAD	GGHS KHAN ABAD	Already Occupied
93.	SHAZIA BIBI	16	GGHS TIKNAI BALA	GGHS TALAI SIA	A.V. Post
94.	KHALIDA NAZ	16	GGHS TANGI TIMERGARA	GGHS TANGI TIMERGARA	Already Occupied
95.	BIBI MARYAM	16	GGHS GALLKOR	GGHS GALLKOR	Already Occupied
96.	SHAGUFTA PARVEEN	16	GGMS SADBAR KALI	GGHSS MAYAR JANDOL	A.V. Post
97.	DILSHAD BIBI	16	GGHS LIKOR KAMBAT	GGHS LIKOR KAMBAT	Already Occupied
98.	NAUREEN BEGUM	16	GGHSS RANI	GGHSS RANI	Already Occupied
99.	NIZAKAT BEGUM	16	GGHS OSAKAI	GGHS OSAKAI	Already Occupied
100.	SHAZIA USMAN	16	GGHS JANGO	GGHS JANGO	Already Occupied

## 2. PROMOTION OF ATs TO THE POST OF SATs B-16

S.No	Name of Teacher (SATs)	BPS	Present Station	Place Of Posting	Remarks
1.	MUSSARAT SHAHEEN	16	GGMS KOTKAY MAIDAN	GGHS BISHRGAM	A.V. Post
2.	KALSOOM ARA	16	GGHS TANGAI TIMERGARA	GGHS TANGAI TIMERGARA	Already Occupied
3.	NAFEESA IQBAL	16	GGHS LIKOR KAMBAT	GGHS LIKOR KAMBAT	Already Occupied
4.	ASIA	16	GGHSS SAMAR BAGH	GGHSS SAMAR BAGH	Already Occupied

## 3. PROMOTION OF TTs TO THE POST OF STT B-16

S.No	Name of Teacher (TTs)	BPS	Present Station	Place Of Posting	Remarks
1.	NOUREEN TAJ	16	GGHS KHALL COLONY	GGHS KHALL COLONY	Already Occupied
2.	ILHAMIA SHAMS	16	GGMS SOGHALY	GGHS THARAI	A.V. Post
3.	MARYAM BIBI	16	GGMS AJOD	GGHS RAMORA	A.V. Post
4.	NASIM BEGUM	16	GGHS DANWA	GGHS DANWA	Already Occupied
5.	SAFIA RASHID	16	GGHSS SHATAI	GGHSS SHATAI	Already Occupied

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Distt Dir Lower

6.	AFSHA BEGUM	16	GGMS GARRAH	GGHS HAJI ABAD	A.V. Post
7.	UZMA BIBI	16	GGHS KHADAGZAI	GGHS TALAI SIA	A.V. Post
8.	SAIQA BIBI	16	GGMS DHERI TALASH	GGHS SHERKHANI	A.V. Post
9.	FARRUKH NAZ BEGUM	16	GGMS MANDISH	GGHSS RANI	A.V. Post

Note: 1. Terms and conditions will remain the same as in notification referred above.

**Consequential adjustment Order.**

S.No	Name of Teacher	Designation with BPS	Place of Posting	Remarks
1.	AISHA GRAN	CT B-15	GGMS BANR OUCH	Against S.No.04
2.	SHARAFAT	CT B-15	GGMS BANR OUCH	Against S.No.07
3.	UZMA LASANI	CT B-15	GGMS MENA OUCH	Against S.No.18
4.	BAKHT MEENA	CT B-15	GGHS KHANPUR	Against S.No.35
5.	SARA NEELAM	CT B-15	GGMS DARMAL	Against S.No.43
6.	KHALIDA AHMAD	CT B-15	GGMS MENA BATAN	Against S.No.49
7.	NADIA BIBI	CT B-15	GGMS SOGHALY	Against S.No.62
8.	RABIA NOUREEN	CT B-15	GGMS CHAT PAT	Against S.No.67
9.	AZRA YOUSAF	CT B-15	GGMS MENA OUCH	Against S.No.69
10.	ALMAS BEGUM	TT B-15	GGMS GARRAH	Against S.No.06

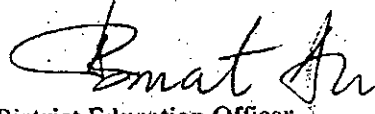
(ASMAT ARA QURESHI)  
District Education Officer  
(F) District Dir Lower.


Endst: No. 12-15

Dated Timergara the 06/10/2022.

Copy forwarded for information and necessary action to the:-

1. District Account Officer District Dir Lower.
2. All the Principals/ Head Mistresses concerned.
3. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
4. Officials Concerned.
5. Master File.

  
District Education Officer  
(F) District Dir Lower.

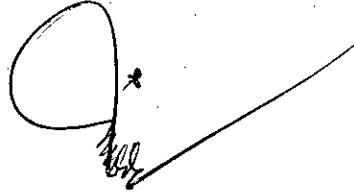
  
**PRINCIPAL**  
GGHSS Saddo  
Distt Dir Lower

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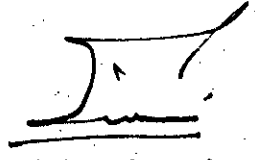
28.04.2022

Clerk of learned counsel for the appellant present. Mr. Riaz Ahmed Painsdakhel, Assistant Advocate General for official respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Supreme Court of Pakistan. Adjourned. To come up for arguments on 19.07.2022 before the D.B.



(Mian Muhammad)  
Member (E)



(Salah-ud-Din)  
Member (J)

19.07.2022

Proper Bench is not available, therefore, case is adjourned to 20.10.2022 for the same as before.



Reader

20<sup>th</sup> Oct, 2022

Junior to counsel for the appellant present. Mr. Muhammad Riaz Khan Painsdakhel, Asst: AG for respondents present.

Junior to learned counsel for the appellant seeks adjournment on the ground that learned counsel is busy before the Hon'ble Peshawar High Court (Dar Ul Qaza) Swat Bench. Last opportunity is granted to argue the case on the next date failing which the case will be decided on the available record without the arguments. To come up for arguments on 01.11.2022 before D.B.



(Fareeha Paul)  
Member(Executive)

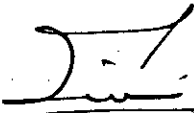


(Kalim Arshad Khan)  
Chairman

21.10.2021

Junior to counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for the official respondents present. Nemo for private respondents.

Written reply of the respondents is still awaited. Learned AAG is required to contact the official respondents. Proper notices be issued to private respondents. Last opportunity is granted to the respondents to furnish reply/comments within 10 days in office positively, failing which their right of reply shall be deemed as struck off. Case to come up for arguments on 11.01.2021 before the D.B.



(Salah-ud-Din)  
Member(J)



Chairman

11.01.2022

Junior to counsel for the appellant. Mr. Kabirullah Khattak, Addl. AG alongwith Mr. Usman ADEO for official respondents No. 1 to 3 present. Nemo for private respondents No. 4 to 8, hence proceeded ex-parte.

Representative of official respondents No. 1 to 3 submitted reply/comments which are placed on file. To come up for rejoinder if any, and arguments before the D.B on 28.04.2022.



(Atiq-Ur-Rehman Wazir)  
Member (E)

05.08.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contends that the case of Mr. Asghar Ali Vide Service Appeal No. 1191/2020 involving common question of facts and law has already been admitted for regular hearing. Further contends that the appellant has suffered in term of her due right for promotion by wrong promotion of others i.e. private respondents. Points raised need consideration. The appeal is admitted for hearing subject to all legal objections including that of limitation to be determined during full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 21.10.2021 before the D.B.

Appellate Deposited  
App  
Security & Process Fee  
Secu

  
Chairman

20.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 05.08.2021 for the same as before.



Reader

19.01.2021

Appellant present through counsel.

As per record, instant service appeal U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 was filed against the promotion order whereby private respondents had been promoted. The very first page of the service appeal shows that appellant has filed the appeal in hand against Secretary E&SE Department and Seven Others whereas the contents of appeal show mention of respondents No.4 to 19 who were promoted. Now on one hand, just Eight persons have been arrayed in the panel of respondents whereas promotion order was challenged in respect of Sixteen persons i.e. (respondents No.4 to 19) who have not been made party. Similarly, the next page i.e. 1(a) shows that Mst. Noor Shaheen has challenged the promotion order wherein Eight persons have been impleaded in the panel of respondents. Spare copies have also not been submitted which objection was put by the office and which was not removed.

In this view of the matter, learned counsel is directed to make up the deficiency and to submit proper service appeal alongwith entire relevant documents and spare copies on or before 20.02.2021 before S.B.

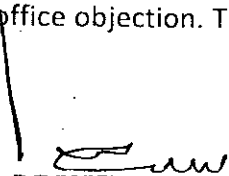
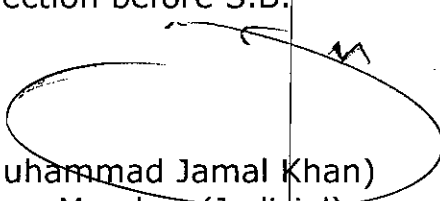
  
(Rozina Rehman)  
Member (J)



Form-A  
FORM OF ORDERSHEET

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

Case No. 7211 /2020


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	23/9/2020	<p>As per direction of the Worthy Chairman this case is submitted to the S. Bench for decision on office objection. To be put up there on <u>03/11/20</u>.</p> <p style="text-align: right;"> REGISTRAR</p> <p>Nemo for appellant.</p> <p>Since the Members of the High Court as well as of the District Bar Association, Peshawar, are observing strike today, therefore, learned counsel for appellant is not available today. Adjourned to 19.01.2021 on which date to come up for arguments on office objection before S.B.</p> <p style="text-align: right;"> (Muhammad Jamal Khan) Member (Judicial)</p>

03.11.2020

The present appeal was submitted on 23.6.2020 by the appellant through Mr. Majeedullah Advocate, so many deficiencies were found in the appeal, objections were raised by this office and appeal was returned to the counsel for the appellant. Today on 12.08.2020 the appeal is resubmitted by the appellant through Mr. Shamsul Hadi Advocate, the learned counsel totally changed the previous memo of appeal and submitted a new memo of appeal. It is pertinent to mention here that the learned counsel only changed the memo of original appeal but he submitted the previous spare copies which are also incomplete. There are contradiction between the original memo of appeal and spare copies. Moreover the counsel for the appellant filed the present appeal against the two different cause of action i.e. promotion and seniority list and also made/preferred two spare departmental appeals but impugned seniority list is not attached with the appeal. Therefore, the objections raised by this office on 23.6.2020 are still stand and the appeal is returned again to the counsel for the appellant for completion and resubmission within 20 days. Note. Original appeal as well as spare copies shall be submitted in approved file covers and duly tagged.

No. 2501 /S.T,

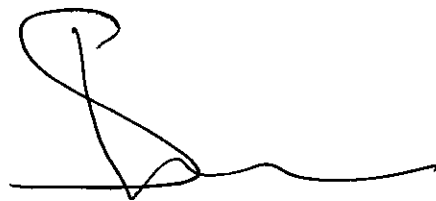
Dt. 13-8 /2020.

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

Mr. Shamsul Hadi Advocate, Swat.

*Resubmitted after*

*needed requirements.*



*24-8-20*

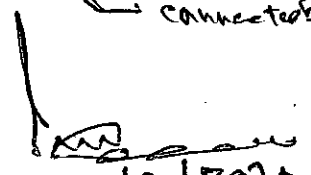
*Re-submitted so that the seniority list was not provided to the appellant by the department that's why the said seniority list was not annexed and furthermore there is no legal bar to have both the promotion & seniority in one and in the same appeal.*

*It is therefore request to file/part-4 of the said appeal before the court/Tribunal to meet the end of Justice*

*21.08.2020*


Sir,

The objection of this office and  
copy of counsel for the appellant is  
submitted for order please. (44 cases)  
connected

  
22/9/2024.

Humble Chairman.

Principle question of Senior list is ancillary  
to the impugned promotion order/nonjection.  
Be fixed before SB alongwith office objections and  
connected cases.

  
23/9


Registrar

The appeal of Mst. Shaheen C.T GGMS Bandagai Dir Lower received today i.e. on 23.06.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Annexures of the appeal may be flagged.
- 3- Annexures of the appeal may be attested.
- 4- Addresses of respondent Nos. 4 to 8 are incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 5- Copy of impugned promotion order dated 25.2.2020 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 6- Copy of departmental appeal against the impugned promotion order is not attached with the appeal which may be placed on it. Annexure-D is an appeal against the seniority list but not against a promotion order because the impugned promotion order was passed on 25.2.2020 and appeal was made on 24.2.2020 much before passing the impugned promotion order.
- 7- Copies of tentative seniority list and objection on tentative seniority list mentioned in para-2 of the memo of appeal are not attached with the appeal which may be placed on it.
- 8- Ten more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.


No. 1291 /S.T,

Dt. 23-06 /2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Majeedullah Adv.  
District Court Dir Lower.

Respected Sir,

It is requested that the requisite documents as per order dated 23/6/2020 could not be received, therefore it is requested that time be extended for compliance. 

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2020.

**Mst Noor Shaheen (C.T.....Appellant.**

**VERSUS**

**Director, E&S Education KPK and others..... Respondents**

**INDEX**

S.N	Description of Documents	Annex	Pages
1.	Memo of Appeal along with Affidavit.		1-05
2.	Addresses of Parties.		06
3.	Copies of promotion order.	A	07-08
4.	Copy of Regularization Act, 2018 and regularization order of respondent 4 to 8.	B	9-18
5.	Copy of impugned promotion order dated: 13.02.2020.	C	19-21
	Copies of departmental appeals	D	22-26
	Wakalat Nama		27

  
Appellant

Through

  
**Shams ul Hadi**

Advocate.

Office: Swat Shopping Mall, Opposite Peshawar

High Court Mingora Bench.

Clerk Cell No.03474773449

1

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

APPEAL NO. 7211 /2020

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 5452

Dated 23/6/2020

Mst. Shaheen D/O Fatih Rahman

Certified Teacher (BPS-15), GGMS Bandagai Dir Lower KP .....APPELLANT

VERSUS

1. The Secretary (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
2. The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Office (F), District Dir Lower.
4. Mst. Hafsa Bibi (GGHS Khazana) District Dir Lower.
5. Mst. Seema Gul (GGHS Mian Banda), District Dir Lower.
6. Mst. Nasira Bibi (GGHSS Odigram), District Dir Lower.
7. Mst. Zaib un Nisa (GGHSS Shawa), District Dir Lower.
8. Mst. Shehnaz (GGMS Ajabay), District Dir Lower.

All care of District Education officer (F), Dir Lower.....RESPONDENTS

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, AGAINST THE PROMOTION ORDER ISSUED BY THE RESPONDENTS NO 1 TO 3 DATED: 25-02-2020, WHEREBY THEY ILLEGALLY PROMOTED THE PRIVATE RESPONDENTS NO 4 TO 19 ADHOC/CONTRACT EMPLOYEE OF 2014 CT BPS-15 TO SCT BPS-16 AND THE APPELLANT REGULAR EMPLOYEE OF CT BPS-15 IS EVENTUALLY PLACED JUNIOR TO THE PRIVATE RESPONDENTS NO 4 TO 19.**

**Filed to-day**  
**Registrar**  
**23/6/2020**  
**PRAYER**

**THAT ON ACCEPTANCE OF THIS APPEAL THE IMPUGNED ORDER DATED: 13-02-2020 ISSUED BY THE RESPONDENTS NO 1 TO 3 MAY KINDLY BE SET ASIDE TO THE EXTENT OF PROMOTION OF PRIVATE RESPONDENTS NO 4 TO 19 AND THEY MAY KINDLY BE CONSIDER JUNIOR TO APPELLANT AND THE APPELLANT BE PLACED SENIOR TO THE PRIVATE RESPONDENTS NO 4 TO 19 AND THE APPELLANT MAY KINDLY BE ORDERED TO BE PROMOTED TO THE POSTS OF SCT ON THEIR RESPECTIVE TURN.**

**R/SHEWETH:**

**ON FACTS:**

1. That the appellant is initially appointed as PST and now serving on the regular post of CT (BPS-15) in education department.
2. That recently the District Education Officer (M), Dir Lower i.e. respondent No 3 circulated final seniority list of certified teachers of Dir Lower whereby the name of the appellant has totally been ignored while those NTS teachers who have been appointed as adhoc/contract C.T. in BPS-15 in the year 2014 and were regularized vide office order

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2020.

***Mst Noor Shaheen (C.T)***

Presently posted at GGMS Bandagai, Dir Lower.

R/O Village Talash, Dir Lower.....Appellant.

**V E R S U S**

1. Director, Elementary & Secondary Education, Khyer Pakhtunkhwa, Peshawar.
2. District Education Officer(Female), Dir Lower.
3. Secretary Education, Khyber Pakhtunkhwa, Peshawar.
4. Hafsa Bi Bi (C.T)  
Presently posted at GGHS Khazana, Dir lower.
5. Seema Gul (C.T)  
Presently posted at GHHS Mian Banda, Dir lower.
6. Nasira Bi Bi (C.T)  
Presently posted at GGHHS Odegram, Dir lower.
7. Zaib un Nisa (C.T)  
Presently posted at GGHSS Shewa, Dir lower.
8. Mst Shenaz (C.T)  
Presently posted at GGMS, Ajaby Dir lower.

.....Respondents

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**APPEAL UNDER SECTION 4 OF KHYBER  
PUKHTUNKHWA SERVICES TRIBUNAL, ACT  
1974, AGAINST THE IMPUGNED PROMOTION  
ORDER DATED; 13.02.2020 THROUGH WHICH  
Respondents Nos.4 to 8 WERE PROMOTED TO  
THE POSTS OF SENIOR CERTIFIED TEACHER  
SCT (BPS-16) ON REGULAR BASIS AND ALSO  
AGAINST THE IMPUGNED SENIORITY LIST  
THROUGH WHICH RESPONDENTS NOS.4 TO 8  
WERE PLACED SENIOR FROM APPELLANT.**

---

**PRAYER IN APPEAL:**

ON ACCEPTANCE OF THIS APPEAL, IMPUGNED PROMOTION ORDER DATED;13.02.2020 THROUGH WHICH RESPONDENTS Nos.4 to 8 WERE PROMOTED TO THE POSTS OF SENIOR CERTIFIED TEACHER, SCT (BPS-16) ON REGULAR BASIS MAY KINDLY BE SET ASIDE AND IMPUGNED SENIORITY LIST THROUGH WHICH RESPONDENTS NO.4 TO 8 WERE PALCED SENIOR FROM APPELLANT MAY ALSO KINDLY BE DECLARE ILLEGAL, AGAINST THE LAW AND RULES AND THE SAME MAY ALSO BE SET ASIDE AND RESPONDENTS NO. 4 TO 8 MAY KINDLY BE DECLARE JUNIOR TO APPELLANT.

**Respectfully Sheweth:**

1. That initially, the Appellant was appointed as Primary School teacher (PST) since long and latter on, the appellant was promoted to the posts of Certified Teacher (C.T BPS-15).(Copy of Promotion order are annexure-A)
2. That Respondents Nos.4 to 8 were appointed as Certified Teacher (C.T) on 30.05.2014 on adhoc/contract basis through NTS and as such services of Respondents Nos. 4 to 8 were regularized in the year 2018 through an act i-e " The Khyber Pakhtunkhwa Employees (Regularization of Services Act, 2018". It is pertinent to mention here that according to section 5 of the ibid Act, the employees whose services are regularized under this Act shall placed/declared junior to all other similarly placed/similar cadre employees who are in service on regular basis.(Copy of regularization Act of 2018 and regularization order of 2018 are annexure-B)
3. That according to the relevant rules, promotion from C.T BPS-15 to the post of SCT BPS-16, 5 years service on CT post is mandatory but through impugned promotion order dated:13.02.2020 respondents Nos.4 to 8 were promoted to the



Posts of SCT BPS-16 against the relevant promotion rules and they were also placed senior on seniority list from the appellant without circulating the seniority list.(Copy of impugned promotion order dated:13.02.2020 is annexure-C)

4. That after the impugned promotion order dated:13.02.2020, the appellant approached respondents No.1 and 2 for getting copies of impugned seniority list and impugned promotion order where they have refused to provide copy of seniority list hence the appellant filed separate departmental appeals against the impugned promotion order dated;13.02.2020 and impugned seniority list, where the same were not decided within statutory period.(Copies of departmental appeals are annexure-D)
5. That time and again the Appellant made so many request to concerned officials for obtaining seniority list but till date no heed was paid to his requests nor the said seniority list was provided to appellant for further legal adjudication.

That being aggrieved the Appellant, prefers this appeal on the following grounds amongst others inter-alia.

**GROUND:**

- A. That the actions and inactions of the respondents by promoting the respondents and are against the law and policy laid down for the purpose and the same is also against the regularization Act,2018.
- B. That impugned promotion order dated:13.02.2020 has badly prejudice legitimate expectancy of promotion of the appellant because through impugned promotion order the official respondents have filled the vacant posts of SCT BPS-16 and they have also placed senior respondents Nos.4 to 8 on seniority list against the law and regularization Act.

- C. That the posts of S.C.T BPS-16 were filled through promotion of the respondents on illegal seniority list and the said seniority list was also not circulated and till date the same has not been communicated to appellant, just to accommodate his blue eyed persons which clearly showing the ill intention of the respondents No.1 and 2.

It is, therefore, humbly prayed that on acceptance of this appeal, impugned promotion order dated;13.02.2020 through which respondents nos.4 to 19 were promoted to the posts of Senior Certified Teacher, SCT (BPS-16) on regular basis may kindly be set aside and impugned seniority list through which respondents no.4 to 8 were placed senior from appellant may also kindly be declare illegal, against the law and rules and the same may also be set aside and respondents no. 4 to 8 may kindly be declare junior to appellant.

Or

Any other relief which this august Court deems appropriate may kindly be awarded to meet the ends of justice.

Appellant



**Shaheen**

Through



**Shams ul Hadi**

Advocate, Peshawar.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,**  
**PESHAWAR.**

Service Appeal No: \_\_\_\_\_/2020.

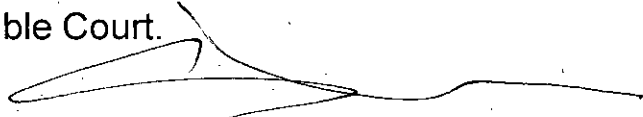
**Mst Noor Shaheen (C.T)**.....Appellant.

**VERSUS**

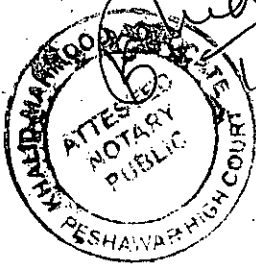
Director, E&S Education KPK and others.....Respondents

**AFFIDAVIT**

I, **Shams ul Hadi**, Advocate, Peshawar do hereby as per information conveyed to me by my client solemnly affirm and declare that the contents of the **appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT



**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,  
PESHAWAR.**

Service Appeal No. \_\_\_\_\_/2020.

***Mst Noor Shaheen (C.T)***.....Appellant.

**V E R S U S**

Director, E&S Education KPK and others..... Respondents

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

***Mst Noor Shaheen (C.T)***

Presently posted at GGMS Shamshi Khan, Dir Lower.

R/O Village Talash, Dir Lower

**RESPONDENTS:**

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer(Female), Dir Lower.
3. Secretary Education, Khyber Pakhtunkhwa, Peshawar.
4. Hafsa Bi Bi (C.T)  
Presently posted at GGHS Khazana, Dir lower.
5. Seema Gul (C.T)  
Presently posted at GHHS Mian Banda, Dir lower.
6. Nasira Bi Bi (C.T)  
Presently posted at GGHS Odegram, Dir lower.
7. Zaib un Nisa (C.T)  
Presently posted at GGHS Shewa, Dir lower.
8. Mst Shenaz (C.T)  
Presently posted at GGMS, Ajaby Dir lower.

*Shahen*  
Appellant

Through

**Shams ul Hadi**  
Advocate, Peshawar.

Amu (7) PST / PSHT to CT

OFFICE OF THE DISTRICT EDUCATION OFFICER (T) DISTRICT DIR LOWER

Office Order

Consequent upon the recommendation of the District Selection/Promotion Committee Dir lower in its meeting held on 25/04/2016 and in pursuance of Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching cadre Dated 13/11/2012 issued by the Govt. of Khyber Pakhtunkhwa (E&SE) Deptt: Peshawar and Notification No. SO(PE)4-5/SSRC/Meeting/2012/Teaching cadre dated 24/04/2013 issued by the Govt. of Khyber Pakhtunkhwa (E&SE) Deptt: Peshawar, the following SPST's/PSHT's are hereby promoted to CT B-15 (Rs: 10985-905-38135) plus usual allowances as admissible under the rules with immediate effect in the interest of public service.

S#	S.L #	Name of Teacher	Name of School	Adjusted at	Remarks
1	15	Hamida Begum	GCMS Seh sada	GGHS Chakdara	Against vacant post
2	272	Fazilat Begum	GGCMS Haji Abad	GGMS Khungl	Against vacant post
3	318	Rehana yasin	GGPS Ouch Band	GGMS Ouch Malna	Against vacant post
4	324	Khadja	GGPS Jango	GGHS Jango	Against vacant post
5	368	Nizakat Ara	GGPS Ranyal	GGHS Chakdara	Against vacant post
6	381	Tabassum Naz	GGPS Dab Timergara No.2	GGMS Qazi Abad	Against vacant post
7	388	Fatima bibi	GGPS Dheri	GGMS Soghaluy	Against vacant post
8	392	Fartuna Bibi	GGPS Ouch Band	GGMS Ouch Malna	Against vacant post
9	393	Najma	GGPS Haji Abad 1	GGHS Haji Abad	Against vacant post
10	397	Wilayat Rana	GGPS Bandagal	GGMS Bandagal	Against vacant post
11	401	Kanwari	GGPS Ouch Sharqi	GGMS Warak	Against vacant post
12	404	Nazlati Begum	GGPS Dab Timergara No.2	GGMS Qazi Abad	Against vacant post
13	410	Naz Begum	GGPS Asiqi dara No.2	GGMS Sallgram	Against vacant post
14	411	Sohil begum	GGPS Andheray	GGMS Kheema	Against vacant post
15	412	Noor Jehan	GGPS Tikas	GGMS Soghaluy	Against vacant post
16	419	Tajul Haram	GGPS Bandagal	GGMS Bandagal	Against vacant post
17	424	Noor Shahida	GGPS Mirza Abad	GGHS Shamahl Khan	Against vacant post
18	432	Shahida Bibi	GGPS Gero Thangay	GGHS Belawroo	Against vacant post
19	436	Sadeqat Shahrlyar	GGPS Munjal	GGMS Reharpur	Against vacant post
20	449	Falak Naz Begum	GGPS Ouch Malna	GGMS Warak	Against vacant post
21	452	Anwar Sullan	GGPS Kotigram Payeen	GGMS Khair Abad	Against vacant post
22	489	Himayat Begum	GGPS Manyal	GGHS Manyal	Against vacant post
23	491	Musarrat Begum	GGPS Nambatal	GGMS Bandal Maldan	Against vacant post
24	504	Abida Begum	GGPS Lalai-Slar	GGMS Khair Abad	Against vacant post
25	514	Nagina Khanam	GGPS Khair Abad	GGMS Malna Ballah	Against vacant post
26	516	Fahmeda Bibi	GGPS Timergara No.1	GGMS Kheema	Against vacant post
27	528	Kalsoom Begum	GGPS Shakar Tangay	GGMS Shatal	Against vacant post
28	536	Ruqia	GGPS Tiso	GGHS Ooskal	Against vacant post
29	538	Abda Bibi	GCMS Seh sada	GGHS Ramora	Against vacant post
30	539	Navida Bibi	GGPS Sengar	GGHS Ranj	Against vacant post
31	546	Shahida Begum	GGPS Nare tangay	GGMS Nary Tangay	Against vacant post
32	550	Nargis Sneed	GGPS Andheray	GGHS Khandero	Against vacant post

**Intikhab Photo State**  
Near National Bank Colony,  
Ehlan Sialkot, Timergara

C.T.C

TERMS & CONDITION.

(8)

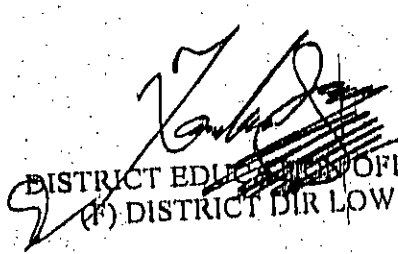
1. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
2. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be proceeded under the rules framed from time to time.
3. This order is issued, errors and omission accepted, as a notice only.
4. 60% candidates have been promoted from amongst the eligible SPST's/PSHT's.
5. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to them in light of this order will be recovered and if they are wrongly promoted they will be reversed.
6. The SDEO's (P) Samar Bagli & Timergara Sub-Division are directed to relieve them immediately and LPC's / service books may be completed and handed over to them.
7. No refusal will be allowed as each and every one has been contacted and obtained her consent in advance.
8. No TA/DA is allowed for joining their duty.
9. Charge report should be submitted to all concerned.

(ZAIBUN NISA)  
DISTRICT EDUCATION OFFICER  
(P) DISTRICT DIR LOWER.

Endst: No. 2071-76

Dated Timergara the 27/04/2010.

- Copy forwarded for information and necessary action to the:-
1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
  2. District Account Officer District Dir Lower.
  3. Principals/Head Mistress of the schools concerned.
  4. All the SDEOs Concerned.
  5. Officials Concerned.
  6. M/File.

  
DISTRICT EDUCATION OFFICER  
(P) DISTRICT DIR LOWER.

**Intikhab Photo State**  
Near National Bank Colony,  
Balambhat Chowk, Timergara.  
Ph: 0945-022994. Mohl: 0300-9398707

**Intikhab Photo State**  
Near National Bank Colony,  
Balambhat Chowk, Timergara.  
Ph: 0945-022994. Mohl: 0300-9398707

C.T.C  


21/03/18  
9  
Amended  
B  
2  
THE KHYBER PAKHTUNKHWA EMPLOYEES (REGULARIZATION OF SERVICES) ACT, 2018.

(KHYBER PAKHTUNKHWA ACT NO. X OF 2018)

Print published after having received the assent of the Governor of the Khyber Pakhtunkhwa in the Gazette of Khyber Pakhtunkhwa (Extraordinary), dated the 7<sup>th</sup> March, 2018.

AN  
ACT

to provide for the appointment and regularization of services of certain employees appointed on adhoc basis against civil posts and contract basis against project posts in the Province of the Khyber Pakhtunkhwa.

WHEREAS it is expedient to provide for the appointment and regularization of services of certain employees appointed on adhoc basis against civil posts and contract basis against project posts in the Province of the Khyber Pakhtunkhwa;

It is hereby enacted as follows:

1. Short title, application and commencement.--(1) This Act may be called the Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2018.

(2) It shall apply to all the employees as defined in clause (e) of subsection (1) of section 2 of this Act.

(3) It shall come into force at once.

2. Definitions.-- (1) In this Act, unless the context otherwise requires;

(a) "Commission" means the Khyber Pakhtunkhwa Public Service Commission;

(b) "contract appointment" means the appointment of a duly qualified person, for a specific period, made against project posts, in a prescribed manner;

(c) "Departmental Selection Committee" means a Departmental Selection Committee, constituted for the purpose of making selection for initial recruitment to civil post under a Government Department or office of Government;

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(d) "Government" means the Government of the Khyber Pakhtunkhwa;

(e) "employee" mean duly qualified,-

(i) one hundred and fifty-eight (158) District Specialists of Health Department, who are appointed on adhoc basis against civil posts w.o.f. 4<sup>th</sup> July, 2017 and holding such civil posts till the commencement of this Act; and

(ii) persons, who are appointed in the projects on contract basis in accordance with the project policy;

(f) "Government Department" means a Government Department, as defined in the Khyber Pakhtunkhwa Government Rules of Business, 1985;

(g) "law or rule" means the law or rule, for the time being in force, governing the selection and appointment of civil servants;

(h) "project" means a perpetual nature project, the continuation on which and conversion to regular budget is essential for service delivery duty identified by the Departments and reflected in the Schedule;

(i) "civil post" means a civil post under Government or in connection with the affairs of Government to be filled in on the recommendation of the Commissioner;

(j) "project post" means a post in the project; and

(k) "Schedule" means a Schedule appended to this Act.

(2) The expression "ad hoc appointment" shall have the same meaning as is assigned to it in the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).

3. Regularization of services of ad hoc employees,---Notwithstanding anything contained in any law or rules, the employees of sub-clause (i) of clause (e) of sub-section (1) of section 2 of this Act, appointed on ad hoc basis against civil posts and holding such civil posts till the commencement of this Act, shall be deemed to have been validly appointed on regular basis, from the date of commencement of this Act.

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subject to verification of their qualifications and other credentials by the concerned Government Department.

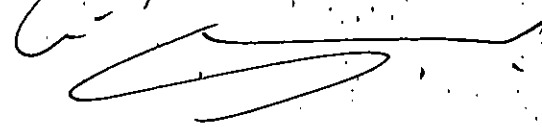
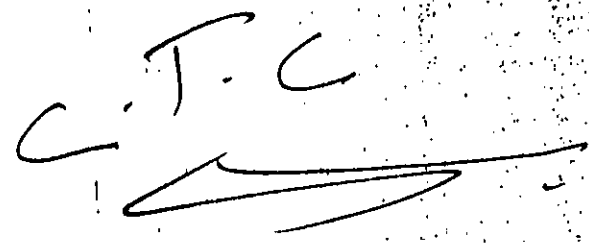
4. Regularization of services of project employees.---Notwithstanding anything contained in any law or rules, the employees of sub-clause (ii) of clause (e) of sub-section (1) of section 2 of this Act, appointed on contract basis against project posts and holding such project posts till the commencement of this Act, shall be deemed to have been validly appointed on regular basis from the date of commencement of this Act, subject to verification of their qualifications and other credentials by the concerned Government Department.

provided that the terms and conditions of services of employees reflected at S.No.5 of the Schedule shall further be governed under the National Disaster Management Authority Act, 2010 (Act No. XXIV of 2010) and Regulations made thereunder and the terms and conditions of services of employees reflected at S.No.6 & 7 of the Schedule shall be governed under the Khyber Pakhtunkhwa Emergency Response Services Act, 2012. (Khyber Pakhtunkhwa Act No. XV of 2012).

5. General conditions for regularization.---For the purpose of regularization of the employees under this Act, the following general conditions shall be observed:

- (i) the service promotion quota of all service orders shall not be affected;
- (ii) the employees shall possess the same qualification and experience as required for a regular post;
- (iii) the employees have not resigned from their services or terminated from service on account of misconduct, inefficiency or any other grounds before the commencement of this Act; and
- (iv) the services of such employees shall be deemed to have been regularized only on the publication of their names in the Official Gazette.

6. Seniority.---(1) Except the employees mentioned in the proviso to section 4 of this Act, whose services are to be regulated by their respective laws and rules, all other employees whose services are regularized under this Act or in the process of regularizing service at the commencement of this Act, shall rank junior to all civil servants belonging to the same service or order, as the case may be, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission or Departmental Selection Committee, as the case may be, made before

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the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

(2) The seniority inter-se of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous affiliation in such service or cadre.

Provided that if the date of continuous affiliation in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

7. Removal of difficulties.---If any difficulty arises in giving effect to any of the provisions of this Act, the Chief Minister may make such order not inconsistent with the provisions of this Act as may appear to it to be necessary for the purpose of removing such difficulty.

Provided that no such powers shall be exercised after the expiry of one year from the coming into force of this Act.

8. Overriding effect.---Notwithstanding anything to the contrary contained in any other law or rule for the time being in force, the provisions of this Act shall have an overriding effect and the provisions of any such law or rule to the extent of inconsistency to this Act shall cease to have effect.

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SCHEDULE  
See section 2(1)(h)(i)

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1. Capacity Building of Planning and Development Department.
2. Establishment of M&E System in Khyber Pakhtunkhwa.
3. Sustainable Development Unit, Planning and Development Department.
4. Urban Policy Unit, Planning and Development Department.
5. Provincial Reconstruction, Rehabilitation & Settlement Authority under Provincial Disaster Management Authority.
6. Establishment of Emergency Rescue Services (Rescue 1122) in 16 Districts.
7. Establishment of Planning, Monitoring & Evaluation Wing in ERS (Rescue 1122) Headquarter.
8. Roll Back Malaria Control Program.
9. Prime Minister's Program for prevention and control of Hepatitis.
10. Establishment of Financial Management Cell in Health Department.
11. Establishment of Safe Blood transfusion.
12. Strengthening of TB Control Program Khyber Pakhtunkhwa.
13. Establishment of Procurement Cell in office of DCI Health Services, Peshawar.
14. Mother, Neonatal and Child Health (MNCH) Program in Khyber Pakhtunkhwa.

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- 15. Social Health Protection Initiative for Khyber Pakhtunkhwa.
- 16. Establishment of Bachu Khan Medical College Mardan.
- 17. Integrated HIV, Hepatitis and Thalassemia Control Program.
- 18. Construction of Shaheed Mohtarama Benazir Bhutto Children Hospital Mardan.
- 19. Higher Education Management Information System (HEMIS) Cell.
- 20. Project Management Unit (PMU) for Implementation of BS Program and Special Initiatives.
- 21. Computerization of Arms License.
- 22. Prison Management Information System.
- 23. Development of Common Application for Government Departments.
- 24. ICT Infrastructure for Government of Khyber Pakhtunkhwa.
- 24A. IT Support for Improvement of Health Service Delivery.
- 24B. IT Professional Training Centre.
- 25. Strengthening of Planning Cell at Elementary & Secondary Education Department.
- 26. Provision of free text book to all students of Khyber Pakhtunkhwa upto Intermediate level (Phase-XIV).
- 27. Strengthening of Planning Cell at Industries Department.
- 28. Establishment of Special Media Cell in the Directorate of Information.
- 29. Strengthening of Information Department.

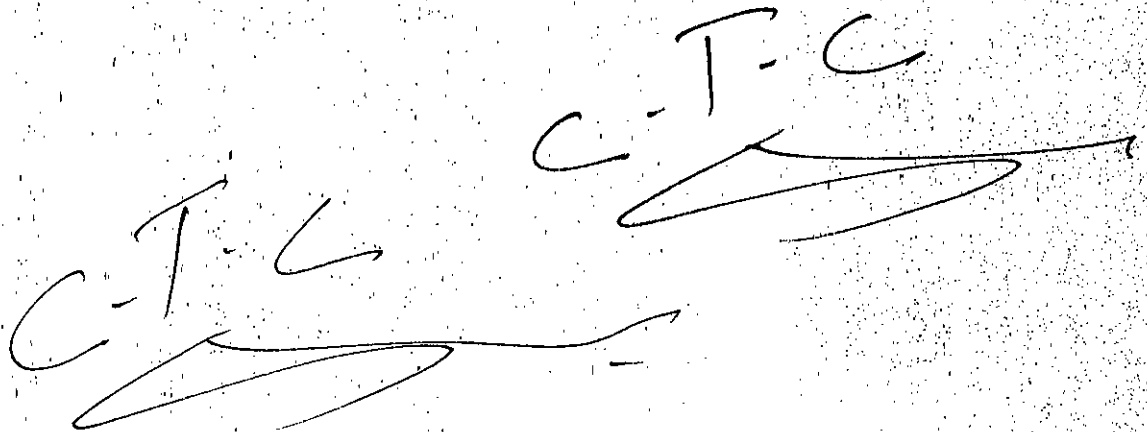
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30. Establishment of three FM Stations at Kohat, Swat and Abbottabad.
31. Establishment of Planning Cell at Local Government and Rural Development Department.
32. Retirement Benefit and Death Compensation Cell.
33. Automation of Pension Payment System (APPS).
34. Energy Monitoring Unit.
35. Establishment of Planning Cell in Food Department.
36. Automation of Food Department.
37. Operationalization of Redesigned Energy and Power Department.
38. Establishment of Planning Cell in Energy and Power Department.
39. Computerization of Land Record.
40. Creation of MRS Cell in C&W Department.
41. Enhancement of existing facilities in MIS/CIS for C&W Department.
42. Strengthening of Planning Cell and Monitoring of Developmental Projects of Agriculture Department.
43. Project Coordination Unit (PCU) for Implementation of Law and Order Initiative in Khyber Pakhtunkhwa.
44. Afghan Management and Repatriation Cell at Home Department.
45. Traffic Control Management System and FM Radio 693-120173.
46. Strengthening of Prosecution Directorate, PCMC and Planning Cell at Home Department.

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- 47. Establishment of 100 Family Welfare Centers.
- 48. Establishment of Population and Research Training Institute and Social Mobilization.
- 49. Value Addition/Research and Development works on Ore Minerals in Khyber Pakhtunkhwa.
- 50. Establishment of Model Coal Mine at Shalikat District Nowshera.
- 51. Establishment of Zoo for Peshawar Division.
- 52. Development and Management of National Park in Khyber Pakhtunkhwa.
- 53. Conservation and Management of Wildlife in Central and Northern Division.
- 54. Establishment of Monitoring, Evaluation, Grievance and Inquiry Cell in Administrative Department.
- 55. Establishment of Climate Change Cell for Multilateral Environmental Agreements.
- 56. Carbon Stock Assessment in Khyber Pakhtunkhwa.
- 57. Introduction of Range Management Initiatives in Khyber Pakhtunkhwa.
- 58. Establishment of Engineering Wing in Sports, Tourism, Archeology, Youth Affairs and Museums Department.

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original  
Dir Lower Female Regularization

## District Education Officer Female Dir Lower

PH No. 0945-9250083,

Fax 10945-824083

E-mail [emisdeoofdirlower@gmail.com](mailto:emisdeoofdirlower@gmail.com)



### Notification

Under the provision of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), & Elementary and Secondary Education Govt. of Khyber Pakhtunkhwa notification No.SO(8/P) ENSIED/3-2/2018/SITT/Contract dated 16/02/2018, Services of the following Certified Teachers (CT's) appointed on adhoc basis on Contract, are hereby regularized in BPS-15, on the same posts in Teaching Cadre on the terms and condition given below with effect from the date of their appointment on the CT post

#### CT-2014

Sr	RollNo	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extensio order No and date If any
1.	2410180	Hafsa Bibi	Sado Dir Lower CNIC NO 18302-1890111-4	122.17	GGMS Shuntala	1075-78 Date 03/052014	5472-7 dated 108-20
2.	2410211	Shahnaz	Mayar Dir Lower CNIC NO 71501-020706-6	120.49	GGMS Maskani	---do---	---do---
3.	2411010	Shajista Bibi	Chakdara Dir lower	117.13	GGMS Lararn	---do---	---do---
4.	2410200	Seema Gull	Chakdara Dir lower CNIC no 15307-1808310-8	110.88	GGMS Nary Tangal	---do---	---do---
5.	2410159	Nasira Bibi	Belambal Dir Lower CNIC NO 15306-4398096-0	115.85	GGMS Lajbok	---do---	---do---
6.	2410188	Zeb Un Nisa	Tindodog Adenzal Dir Lower 37301-2228890-0	115.02	GGMS Mator	---do---	---do---

#### CT-2015

Sr	RollNo	Name	Address	Total Marks [out of 200]	School	Appointment order No and dated	Extensio order No and date If any
1.	891101402	TAHIRA JAMAL	SHAHI KHEL TALASH	118.8	GGMS Bajan	---do---	---do---
2.	481100420	NEELEM HABIB	PILA KHAL LUND KHWAR DISTRICT MARDAN	117.2	GGMS Buchinkay	---do---	---do---
3.	891101252	SAADAT BIBI	SHAHI KHEL	116.3	GGMS Dehral	---do---	---do---

Distt. Education officer  
(F) Distt. Dir (L)

order  
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**Dir Lower Female Regularization Order CT Adhoc**

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33.	8942000108	AIBIHA BEGUM	VILLAGE MUSSA ABAD TEHSIL AND POST OFFICE MUNDA DISTRICT LOWER DIR	103.57	GUMS NERO	---do---
34.	8942000520	NABIM	Talash Dir Lower	105.50	GUMS AJWA	2977-85 Dated: 1-06- 2017
35.	8942000072	LUBINA NAZ	Talash Dir Lower	106.88	GUMS INZAILI	2796-2804 Dated: 13-06- 2017
36.	8942000771	SAPHA BIBI	Adanzal Dir Lower	106.28	GUMS MAYAN	---do---
37.	8942000224	BADIA	Malakand Dir Lower	106.08	GUMS MAYAN	---do---
38.	7741000330	NABIHA SARDAR	Adanzal Dir Lower	105.44	GUMS TAWDA CHINA	---do---
39.	7742000720	UZMA GHAFPOOR	Dargal Malakand	105.42	GUMS MIAN BIANBOLA	---do---
40.	8942000808	ASMA GUL	Talash Dir Lower	103.00	GUMS DAMTAL	---do---
41.	8942000864	HINA RAFI	KHail Dir Lower	99.26	GUMS KOWARD MANAI	---do---

**TERMS & CONDITIONS.**

1. The regularization will not be in favour of those, who have not taken over charge or has remained absent from duty or resign from service and also not for those who are under disciplinary proceedings.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. The employees whose services are regularized under The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) or in the process of attaining service at the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

Distt. Education Officer,  
 (F) Distt. Dir (L)

DISTRICT EDUCATION OFFICER  
 DISTRICT DIR (L)

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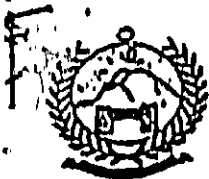


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Annex  
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Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Dir Lower Senior Cadre Page 11

Notification

Consequent upon the recommendation of the Departmental Promotions Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No. SO (B&A)/1-18/B&SE/2012 dated: 11.07.2012 and Finance Department Endorsement No. SO (FR)/FD/10-22(B) 2010 dated: 16.07.2012, the following CT, DM, AT, IT and PET (Female) are promoted to the post of Senior CT, Senior DM, Senior AT, Senior IT and Senior PET are promoted in BPS-16 (Rs. 18910-1520-64510) respectively, 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 adjusted by the District Education Officer (Female) concerned.

ITEM NO.1 PROMOTION OF CT R-15 TO SCT R-16 ON REGULAR BASIS

Method of Recruitment		Total Posts
By Promotion	Total No. of CT Posts(duly verified from DAO)	538
	1/3 % share of Senior CT Posts	177
	Already Promoted	139
	Not to be Promoted	38
	Proposed for Promotion	10

S.No	S.L. No	Name	Place of Posting	Date of Birth	Date of Appointment as Regular	Remarks
01	01 ✓	Nazima Kalsoom	GGMS Markhanai	28/02/1973	28/02/1998	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
02	02 ✓	Farzina Naz	GGMS Bandagal	15/12/1978	01/03/2004	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
03	03 ✓	Zainab BIBI	GGMS Seer Toormang	15/05/1978	01/05/2004	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
04	04 ✓	Jawhar Sani	GGMS Khail Payeen	20/03/1978	01/04/2005	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
05	05 ✓	Rukhsana Sultan	GGMS Warsak	01/07/1982	25/11/2006	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
06	06 ✓	Mahiyat Begum	GGHS Maniyat	01/12/1976	01/03/2009	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
07	07 ✓	Rafia Hina	GGMS Adam Dheri	01/03/1981	01/06/2011	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
08	08 ✓	Neelam Shahzadi	GGHS Dara Ramora	01/04/1979	01/06/2011	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
09	09 ✓	Jawahirat	GGHS Lajbook	10/07/1976	26/11/2011	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.

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16	✓	Shaheena Parveen	GOOMS Timergara	25/10/1973	28/10/2014	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.	
11	17	✓	Salsalat Begum	GOOMS Mandish	01/01/1973	28/10/2014	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
12	18	✓	Farhana	GOOMS Tikni Payeen	01/03/1969	28/10/2014	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
13	19	✓	Shahid Sultan	GOOMS Assigal	02/03/1966	28/10/2014	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
14	20	✓	Zahida BIBI	GOOMS Qazi Abad	01/01/1974	15/11/2014	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
15	10		Hafsa BIBI	GOHS Khazana	04/05/1983	03/05/2014	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
16	12		Seema Gul	GOHS Mian Brangola	23/03/1986	03/05/2014	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
17	13		Nasira BIBI	GOHS Odigram	03/03/1987	03/05/2014	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
18	14		Zaib un Nisa	GOHSS Shawa	21/12/1979	03/05/2014	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.
19	15		Shahnaz	GOOMS Ajabay	03/01/1980	03/05/2014	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SCT BPS-16 on regular basis with immediate effect.

**ITEM NO.2 PROMOTION OF DM B-15 TO SDM B-16 ON REGULAR BASIS**

Method of Recruitment		Total Posts
By Promotion	Total No. of TT Posts(duly verified from DAO)	106
	1/3 rd share of Senior TT Posts	35
	Already Promoted	26
	Need to be Promoted	09
	Proposed for Promotion	04

S.No	S.L No	Name	Place of Posting	Date of Birth	Date of Appointment as Regular	Remarks
01	01	Nargis	GOOMS Ailgy	01/03/1965	15/08/1995	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SDM BPS-16 on regular basis with immediate effect.
02	02	Nihayat DIDI	GOHSS Khadagzal	01/05/1975	13/05/1997	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SDM BPS-16 on regular basis with immediate effect.
03	03	Taslim DIDI	GOHS Dajawro Talah	01/05/1977	29/03/2001	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SDM BPS-16 on regular basis with immediate effect.
04	05	Kalsoom	GOOMS Tikas Danrgay	01/01/1985	24/08/2007	Services placed at the disposal of DEO (F) Dir Lower for further adjustment against the vacant post of SDM BPS-16 on regular basis with immediate effect.

**ITEM NO.3 PROMOTION OF PET B-15 TO SPET B-16 ON REGULAR BASIS**

Method of Recruitment		Total Posts
Total No. of PPT Posts(duly verified from DAO)		115

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18	Navida	GGHS Kotkai PayeeKheel	21/05/1977	11/06/1999	Services placed at the disposal of DEO (F) Lower for further adjustment against the vacant post of STT BPS-16 on regular basis immediate effect.	
04	20	Shahnaz Ara	GGHS Badin	12/04/1981	01/08/2004	Services placed at the disposal of DEO (F) Lower for further adjustment against the vacant post of STT BPS-16 on regular basis immediate effect.
15	22	Uzma Tabasum	GGHS Hajid Abad	03/02/1986	31/7/2004	Services placed at the disposal of DEO (F) Lower for further adjustment against the vacant post of STT BPS-16 on regular basis immediate effect.
6	24	Alia Begum	GGHS Sillgram	02/01/1985	01/08/2004	Services placed at the disposal of DEO (F) Lower for further adjustment against the vacant post of STT BPS-16 on regular basis immediate effect.

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 their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se- seniority on lower post will remain intact.
6. No TADA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light of this order will be recovered and if he/she is wrongly promoted he/she will be reversed.
8. Before handing over charge once again their document may be checked if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.

(Hafiz Muhammad Ibrahim)  
 Director  
 Elementary and Secondary Education  
 Khyber Pakhtunkhwa Peshawar.

Endst: No. 104-09 /A-17/DPC-2019/KPK

Dated Peshawar the 13-2-2020

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (F) Dir Lower.
3. District Accounts Officer Dir Lower.
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

*(Signature)*  
 Deputy Director Establishment (F)  
 Elementary and Secondary Education  
 Khyber Pakhtunkhwa Peshawar

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*(Signature)*  
 13/2/2020

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بخدمت جناب ڈائریکٹر صاحب ایلمنٹری اینڈ سیکنڈری ایجوکیشن KP پشاور

درخواست / اپیل بمراد درستی Seniority لسٹ بغرض Promotion

ترقی سائیکلہ در عہدہ SCT-BPS-16 -

جناب عالی! حسب ذیل عرض ہے۔

1- یہ کہ سائیکلہ بحیثیت CT ملازم محکمہ تعلیم میں بمقام GGMS بانڈہ گئی بطور ریگولر ملازمہ فراہم کرنا سرانجام دیتی چلی آرہی ہے۔

2- یہ کہ حال ہی میں محکمہ تعلیم ڈسٹرکٹ ایجوکیشن افسر دیرپائین نے CT ملازمین در عہدہ SCT-BPS-16 پروموشن کی ہے۔ جس میں سائیکل سے جو نیئر ملازمین کو ترقی دے کر سینئرٹی لسٹ غیر قانونی طور پر مرتب کی ہے۔ جس کے خلاف بوجہات ذیل درخواست / اپیل ہذا دائر کی جاتی ہے۔

i- یہ کہ سائیکلہ بطور ریگولر ملازم عرصہ دراز سے محکمہ تعلیم میں خدمات سرانجام دیتا چلا آرہا ہے۔ جبکہ سینئرٹی لسٹ مرتب کردہ محکمہ تعلیم دیرپائین میں سال 2014 میں ایڈہاک / کنٹریکٹ پر بھرتی شدہ ملازمین شامل کئے گئے ہیں۔ جو کہ سال 2018 میں بروئے Khyber Pakhtunkhwa Employees Regularization of service Act 2018 مستقل / پرمٹ کئے گئے ہیں۔

ATTEST  
یہ کہ مذکورہ بالا ایکٹ کے دفعہ 5 ذیلی دفعہ (i) کے تحت یہ قرار دیا گیا ہے۔ کہ ملازمین کے پروموشن (Promotion Quota) متاثر نہیں ہوگا۔ اس بنا مذکورہ دفعہ ذیل عرض کیجاتی ہے۔

Section 5:- General Condition for Regularization for the Purpose of regularization of the employees under this act, the following general condition shall be observed

(23)



(i). The service Promotion quota of all service, cadets shall not be affected.

27/12/2012  
یہ کہ مذکورہ بالا ایکٹ کے دفعہ 3 کے تحت قرار دیا گیا ہے کہ ایڈہاک / کنٹریکٹ ملازمین کی ریکورڈنگ / تعیناتی / گھرسنیارٹی ایکٹ کے اجراء سے تصور ہوگی۔

iv۔ یہ کہ مذکورہ بالا ایکٹ کے دفعہ 6 کے تحت کنٹریکٹ / ایڈہاک ملازمین جو کہ ایکٹ مذکورہ بالا کے تحت مستقل کئے گئے ہیں۔ ہر صورت میں ان ریکورڈنگ ملازمین سے جو نئے تصور ہونگے۔ جو ایکٹ کے اجراء سے قبل متعلقہ عہدہ پر تعینات ہوں متعلقہ دفعہ جو کہ ذیل عرض کیا جاتا ہے۔

(i). Except the employees Proviso to section 4 of this act, whose services are to be regulated by mentioned in the their respective laws and rules, all other employees whose service are regularized under this act are in process of attaining service at the commencement of this act, shall rank junior to all Civil servant belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of this act, and shall also rank junior to such other persons, if may, who, in pursuince of the recommendation of the commission or department selection committee, as the case may be, made before the commencement of this act, are to be appointed to the respective service or cadre, irrespective of their actual date of appointment.

ATTESTED

27/12/2012  
27/12/2012

(24)



Section 6 Seniorit:-

-v یہ کہ KP Employees Regularization of service Act 2018 کے دفعہ 8 کے تحت یہ قرار دیا گیا ہے۔ کہ ایک متذکرہ دیگر ہر قسم تو انین پر فوقیت حاصل ہوگی۔ جو کہ ذیل عرض کیا جاتا ہے۔

Section 8 overriding Effect:-

Notwithstanding anything to the contrary contained in any other law or rule for the time being enforce, the provision of this act shall have an overriding effect and the provision of any such law or rule to the extent of inconsistency to this act shall cease to have effect.

-vi یہ کہ مذکورہ بالا ایکٹ سے یہ امر عیاں ہے کہ سائیلہ کو سنیاء ٹی لسٹ بغرض پروموشن / ترقی در عہدہ SCT-BPS-16 میں بمقابلہ (دیگر کنٹریکٹ / ایڈ ہاک ملازمین جو کہ ایکٹ ہذا کے تحت سال 2018 میں بطور ریگولر ملازمین تعینات ہوئے ہیں)۔ پر فوقیت حاصل ہے۔ لیکن ایسا نہ کر کے محکمہ تعلیم دیرپائین نے سنگین قانونی غلطی کی ہے۔

بحالات بالا استدعاء ہے کہ درخواست سائیلہ کو منظور فرمایا جاوے۔

مورخہ: 24-02-2020

*Shahen*

سائیلہ: شاہین دختر فاتح رحمن GGMS بانڈہ گی ضلع دیرپائین

کاپی ٹو۔

1- ڈسٹرکٹ ایجوکیشن افیسر (فی میل) ضلع دیرپائین بمقام تیرگرہ

2- سیکرٹری ایلیمنٹری اینڈ سیکنڈری ایجوکیشن خیبر پختون خواہ

3- سیکرٹری فنانس خیبر پختون خواہ پشاور

4- چیف سیکرٹری خیبر پختونخوا پشاور  
سائیلہ: شاہین دختر فاتح رحمن آئی ایس ایس GGMS بانڈہ گی

Handwritten Urdu text, likely a letter or document, covering most of the page.

لو، شاہین

Handwritten signature or name in Urdu script.

C.T.C

C.T.C

حضرت صاحب سیرت امیر دین حضرت صاحب

(26)

صدا پائی گئی ہے کہ لکھنؤ میں ۵۰۰  
تعمیرات میں ایسی عمارت لکھنؤ ۵۰۰  
کے ہیں کہ مقررہ ہوا ہے کہ قسط سیرت صاحب  
۵۰۰ کے ساتھ ساتھ اس کے لئے ۲۰۱۶  
کے لئے ۲۰۱۶ کے لئے ہے۔ صرف اس کے لئے ہے  
ان عمارتوں کے لئے ہے۔  
کے لئے ہے۔

Regulation  
Act No.

کے لئے ہے۔

کے لئے ہے۔

24  
2020

کے لئے ہے۔

C.T.C



(27)

بعدالت سروس کمپیونیل چشاور

قیمت ایک روپیہ	کورٹ فیس
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عصا شامصین سے ۲۰ منجانب  
فکونٹ سونپن

مورخہ

مقدمہ

دعویٰ

جرم

## باعث تحریر آنکہ

مقدمہ مندرجہ بالا میں اپنی طرف سے واسطے پیروی وجواب دہی و کل کاروائی متعلقہ آن مقام سروس کمپیونیل چشاور کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زر اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ ڈائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہا گا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سند ہے

۲۰

ماہ

المرقوم

العبد گواہ شمس الدین العبد

کے لئے منظور ہے

سروس کمپیونیل

Attested by Shamsul Haq  
Adv.

بمقام

Adv.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 1191/2020

Khyber Pakhtunkhwa  
Service Tribunal

Case No. 1009

Date 6-2-2020

Mr. Asghar Ali, Certified Teacher (BPS-15),  
GHSS Mian Brangola, District Dir Lower.

..... APPELLANT

**VERSUS**



- 1- The Secretary E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (M), District Dir Lower.
- 4- Mr. Ihtisham Ul Haq, C.T (BPS-15) (NTS)
- 5- Mr. Lal Zada, C.T (BPS-15) (NTS)
- 6- Mr. Latif Ur Rehman, C.T (BPS-15) (NTS)
- 7- Mr. Misbah Ur Rehman, C.T (BPS-15) (NTS)
- 8- Mr. Aziz Ullah Jan, C.T (BPS-15) (NTS)
- 9- Mr. Irfan Uddin, C.T (BPS-15) (NTS)
- 10- Mr. bakht munir, C.T (BPS-15) (NTS)
- 11- Mr. Inayat Ullah, C.T (BPS-15) (NTS)
- 12- Mr. Zakir Ullah, C.T (BPS-15) (NTS)
- 13- Mr. Waheed Zada, C.T (BPS-15) (NTS)
- 14- Mr. Muhammad Israr, C.T (BPS-15) (NTS)
- 15- Mr. Majeedullah Khan, C.T (BPS-15) (NTS)
- 16- Mr. Mehmood Ur Rehman, C.T (BPS-15) (NTS)
- 17- Mr. Isrhad Mehmood, C.T (BPS-15) (NTS)
- 18- Mr. Muhammad Shahid, C.T (BPS-15) (NTS)
- 19- Mr. Mumtaz Bakht, C.T (BPS-15) (NTS)

Certified to be true copy

**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

All care of District Education officer (M), Dir Lower.

..... RESPONDENTS

Filed to day

Registrar

6/2/2020

Re-submitted to day  
and filed.

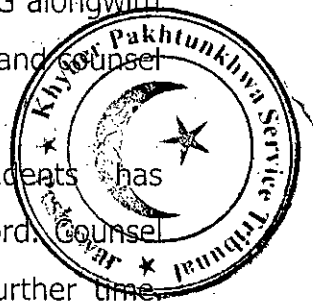
**APPEAL UNDER SECTION-4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974  
AGAINST THE FINAL SENIORITY LIST OF CERTIFIED  
TEACHERS (BPS-15) CIRCULATED ON 26.10.2019  
WHEREBY THE NAME OF THE APPELLANT HAS NOT  
BEEN INCLUDED AND THE PRIVATE RESPONDENTS  
HAVE BEEN ALLOWED/GRANTED SENIORITY FROM THE  
DATE OF ADHOC/CONTRACTUAL APPOINTMENT I.E.  
30.4.2014 IN UTTER VIOLATION LAW & RULES AND  
AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL  
APPEAL OF THE APPELLANT ON NO GOOD GROUNDS  
WITH IN THE STIPULATED PERIOD OF NINETY DAYS**

A No-1191/2020  
Asghar Ali vs Govt

29.09.2020

Junior to counsel for the appellant, Addl. AG alongwith Shahid Anwar, ADO for respondents No. 1 to 3 and Counsel for private respondents No. 4 to 18 present.

Representative of the official respondents has submitted parawise comments. Placed on record. Counsel for private respondents No. 4 to 18 seeks further time. Nemo on behalf of respondent No. 19 despite proper notice, hence proceeded against ex-parte. To come up for reply on behalf of respondents No. 4 to 18 on 19.11.2020 before S.B.



*[Signature]*  
Chairman

19.11.2020

Junior to counsel for appellant and Addl; AG for official respondents and counsel for private respondent No. 4 to 18 present.

Reply on behalf of official respondent No. 1 to 3 has been already submitted. Counsel for private respondent No. 4 to 18 have failed to submit reply/comments, despite last chance. The matter is therefore, posted to 10.02.2021 for arguments before D.B. Appellant may furnish rejoinder to the written reply/comments of official respondents within a fortnight, if so advised.

*[Signature]*  
Chairman

**Date of Presentation of Application** 19/11/21

**Number of Words** 800

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**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar