

15<sup>th</sup> Nov 2022

Learned counsel for the petitioner present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Shuja Ali, ADEO for official respondents No. 1 to 3 present.

Written reply on behalf of private respondents No. 4 to 6 not submitted despite last opportunity, therefore, their right for submission of written reply is struck of. To come up for arguments on 15.12.2022 before D.B at camp court Abbottabad.



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

19.07.2022

Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General present.

Previous date was changed on Reader Note, therefore, notices be issued to the respondents through registered post and to come up for submission of written reply/comments on 20.09.2022 before the S.B at Camp Court Abbottabad.



(Salah-Ud-Din)

Member (J)

Camp Court Abbottabad

20<sup>th</sup> Sept 2022

None for the appellant present. Mr. Kabiruallah Khattak, Addl: AG alongwith Mr. Shuja, ADEO for official respondents No. 1 to 3 present. None for private respondents No. 4 to 6.

Written reply on behalf of respondents No. 1 to 3 submitted which is placed on file. Last chance is given to private respondents No. 4 to 6 for written reply/comments failing which their right for submission of written reply shall be deemed struck off. To come up for written reply/comments on 15.11.2022 before S.B at camp court Abbottabad.




(Kalim Arshad Khan)

Chairman

Camp Court Abbottabad

19.05.2021


Due to cancellation of tour, Bench is not available. Therefore, case is adjourned to 27.09.2021 for the same as before.

  
Reader

27.09.2021

Nemo for appellant.


Preceding date was adjourned on a Reader's note, therefore, appellant/counsel be put on notice for 20.12.2021 for preliminary hearing before S.B at Camp Court, Abbottabad.

  
(Rozina Rehman)  
Member  
Camp Court, A/Abad


20.12.2021

Mr. Hamayun Khan, Advocate, for the appellant present and submitted Wakalat Nama on behalf of the appellant, which is placed on file. Preliminary arguments heard.

Points raised need consideration, therefore, the appeal in hand is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments on 15.02.2022 before the S.B at Camp Court Abbottabad.

  
(Salah-Ud-Din)  
Member (J)  
Camp Court Abbottabad

15-2-22  
Due to retirement of worthy chairman case is adjourned to 19-7-2022 for the same as before.

  
Records

Form- A



# FORM OF ORDER SHEET

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

Case No.-

16419

/2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/12/2020	<p>The appeal of Mst. Shazia Jalil received today by registered post may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR.</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>19-05-2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>

**BEFORE KHYBER PAKHTUNHWA SERVICE TRIBUNAL**  
**CAMP COURT ABBOTTABAD**

Service Appeal No: \_\_\_\_\_ of 2020

Mst. Shazia Jalil daughter of Abdul Jalil, Senior Qaria, Govt Girls Higher Secondary School, Dhamtour, Tehsil & District, Abbottabad.

....APPELLANT

**VERSUS**

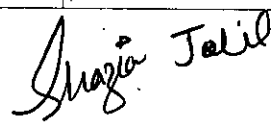
1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Peshawar.
2. Director of Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Elementary & Secondary Education) (Female), Abbottabad.
4. Mst. Attia Nishan SST (Gen) Govt Girls High School Bakote, Tehsil & District, Abbottabad.
5. Mst. Nasreen Bibi SST (Gen) Govt Girls Higher Secondary School. Hajia Gali, Tehsil Havelian, District Abbottabad.
6. Mst. Uzma Rasheed SST (Gen) Govt Girls Middle School Bhuruj, District Abbottabad.

....RESPONDENTS

**SERVICE APPEAL**  
**INDEX**

S. No	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE NO
1	Memo: of Service Appeal alongwith Affidavit	---	1-4
2	Copy of First appointment order dated 19/04/1999 of the appellant.	A	5-6
3	Copies of Academic and Professional certificates of the appellant.	B	7-10
4	Copy of Notification No.SO(B&A)/1-18/E&SE/2012, dated 11/07/2012 by respondent No.1.	C	11-12
5	Copy of Notification dated 20/12/2013 by respondent No.1.	D	13-17
6	Copies of relevant impugned notifications/orders by respondent No.2.	E	18-24
7	Copy of promotion order dated 08/02/2018, by respondent No.3.	F	25
8	Copy of departmental appeal of the appellant dated 11/09/2020 before respondent No.1	G	26-27

Dated 24 / 12 / 2020

  
(Shazia Jalil)  
(appellant in person)

**BEFORE KHYBER PAKHTUNHWA SERVICE TRIBUNAL**  
**CAMP COURT ABBOTTABAD**

Service Appeal No: 16419 of 2020

Mst. Shazia Jalil daughter of Abdul Jalil, Senior Qaria, Govt Girls Higher Secondary School, Dhamtour, Tehsil & District, Abbottabad.

Khyber Pakhtunkhwa  
Service Tribunal **APPELLANT**

**VERSUS**

Diary No. 16921

Dated 24/12/2020

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Peshawar.
2. Director of Elementary & Secondary Education Department, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Elementary & Secondary Education) (Female), Abbottabad.
4. Mst. Attia Nishan SST (Gen) Govt Girls High School Bakote, Tehsil & District, Abbottabad.
5. Mst. Nasreen Bibi SST (Gen) Govt Girls Higher Secondary School Hajia Gali, Tehsil Havelian, District Abbottabad.
6. Mst. Uzma Rasheed SST (Gen) Govt Girls Middle School Bhuruj, District Abbottabad.

....RESPONDENTS

**APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST IMPUGNED PROMOTION NOTIFICATIONS**

**ORDERS FROM QARIAS/S.QARIA TO SST (BPS-16) ISSUED BY RESPONDENT NO. 2 IN WHICH THE APPELLANT WAS ILLEGALLY IGNORED FROM PROMOTION OF QARIA TO SST POST, THE SAID ORDERS ARE TOTALLY AGAINST THE LAW, WITHOUT JURISDICTION MALAFIDY AND ISSUED ON BASELESS FACTS AND APPELLANT FILED A DEPARTMENTAL APPEAL BEFORE RESPONDENT NO.1 ON 11/09/2020 WAS NOT HONORED HENCE, THE APPELLANT IS FILING THE INSTANT SERVICE APPEAL BEFORE THIS HON'BLE TRIBUNAL WITHIN THE SPECIFIC PERIOD OF 120 DAYS.**

Filed to-day  
Registrar

24/12/20

**PRAYER:**

*ON ACCEPTANCE OF THE INSTANT APPEAL, IT IS VERY HUMBLY PRAYED THAT, THE APPELLANT MAY KINDLY BE PROMOTED W.E.F. THE DATE AT WHICH THE MOST JUNIOR TEACHERS from the appellant i.e. RESPONDENTS NO. 4,5,6, (QARIAS/S.QARIAS), WERE PROMOTED TO SST POST, WITH ALL BACK BENEFITS.*

=====

**Respectfully Sheweth,**

**FACTS**

- 1) That, appellant was appointed as a "Qaria" in BPS-09, at GGHS Samundar Khatha, District Abbottabad on 19/04/1999 vide order Endst: No. 3561-70 and appellant took over charge on 20/04/1999. **(Copy of First appointment order dated 19/04/1999 is attached as Annexure "A")**
- 2) That, the appellant passed her B.A Examination from University of Peshawar in 2nd Division in the year 1999 and appellant got profession degree of B.Ed from AIOU Islamabad in the year 2004. **(Copies of Academic and Professional certificates are attached as Annexure "B")**
- 3) That, as the basic scale of the post of Qaria was upgraded into BPS-12 vide Notification No.SO(B&A)/1-18/E&SE/2012, dated 11/07/2012, issued by Respondent No.1 hence, the appellant was also promoted/upgraded from BPS-09 to BPS-12 w.e.f 01/07/2012 in the light of abovementioned notification. Moreover, it was also mentioned in the said notification that 1/3rd Qarias of the total Qarias post, shall be promoted into BPS-15 at the basis of Seniority cum fitness and prescribed qualification. **(Copy of Notification No.SO(B&A)/1-18/E&SE/2012, dated 11/07/2012, is attached as Annexure "C")**
- 4) That, on 20/12/2013, Respondent No.1, issued a notification according to which 75 % teachers (CT/SCT, DM/SDM, AT/SAT, TT/STT,Qaria/S.Qaria) were to be promoted to SST post and in the said

75/% Promotion Quota, 3% quota was also fixed for the promotion of Qaria / S.Qaria to SST post. **(Copy of Notification dated 20/12/2013 is attached as Annexure "D")**

- 5) That, in the light of above mentioned notification dated 20/12/2013, most junior following Respondents No.4,5,6, (Qarias and S/Qarias teachers) were promoted to SST posts vide different notifications issued by respondent No.2, but in the said promotion notifications, the name of appellant was not included for the promotion as SST BPS-16.
- i. Mst. Attia Nishan Abbasi promoted to SST post vide order Endst: No.2527-30 dated 11/05/2016, issued by Respondent No.2 (Director E&S Education KPK, Peshawar).
  - ii. Mst. Nasreen Bibi promoted to SST post vide order Endst: No.5694-5700 dated 22/12/2017, issued by Respondent No.2 (Director E&S Education KPK, Peshawar).
  - iii. Mst. Uzma Rasheed promoted to SST post vide order Endst: No.4118-23 dated 02/03/2020, issued by Respondent No.2 (Director E&S Education KPK, Peshawar). **(Copies of relevant impugned notifications/orders are attached as Annexure "E")**
- 6) That, meanwhile, in the light of Notification No.SO(B&A)/1-18/E&SE/2012, dated 11/07/2012, issued by Respondent No.1, appellant was promoted from Qaria to S/Qaria post on 08/02/2018 vide Endst: No. 1033-37 issued by Respondent No.3 and, at the present, appellant is working at S/Qaria post at GGHSS, Dhamtour, Tehsil & District, Abbottabad in BPS-15. **(Copy of promotion order dated 08/02/2018, is attached as Annexure "F")**



- 7) That, on 11/09/2020, appellant filed departmental appeal before respondent No.1 against the illegal impugned promotions orders issued by respondent No.2 but the same is still pending. **(Copy of departmental appeal is attached as Annexure "G")**
- 8) That, the appellant assails the impugned promotion notifications on the following amongst other grounds:-

**GROUND:**

- a. That, the seniority of any employee is to be considered from the date of first appointment of the employee according to the Rules, Law and Policy.
- b. That, according to the Judgment of August Supreme Court of Pakistan (2004 PLC (C.S) 1228) any permanent basis appointed employee, could never become underside from his junior in seniority.
- c. That, the impugned Notifications/orders were issued only at the basis of malafide intention in which law and Rules were not followed.
- d. That, due to the impugned notification/orders, the service career of the appellant is being suffered badly alongwith financial loss.
- e. That, the appellant fulfills all the codal formalities for promotion into SST post because the appellant have a prescribed qualification alongwith seniority cum fitness.
- f. That the appellant was appointed as a Qaria and now appellant is performing her duty as a S.Qaria in the same cadre and the cadre of appellant never changed in the whole service of appellant due to which the seniority of the appellant could be suffered or effected.
- g. That, there no such kind of order was issued against the appellant under section-4 of the E&D Rules 2011, by the competent or Hire authority due to which the promotion of appellant was liable to be stopped.

- h. That, respondents ignored the appellant from promotion which is not in the jurisdiction of respondents thus, respondents exceeded their power and intentionally ignored the appellant from promotion only to mentally torture the appellant.
- i. That, the instant appeal is well within time.
- j. That, the other point shall be raised at the time of argument with the prior permission of Hon'ble Tribunal.

*It is therefore, respectfully prayed that the instant appeal may graciously be accepted, and the appellant may kindly be promoted w.e.f. the date at which the most junior teachers from the appellant i.e. Respondents No.4,5,6 (Qarias/S.Qarias), were promoted to SST(Gen) post with all back benefits. Any other relief for which the appellant is entitled and same is not asked/prayed specifically, may kindly be granted in the favour of the Appellant too.*

Dated 24/12/2020

*Shazia Jalil*

(Shazia Jalil)  
(Appellant Inperson)

**AFFIDAVIT:**

I, Mst. Shazia Jalil daughter of Abdul Jalil, Senior Qaria, Govt Girls Higher Secondary School, Dhamtour, Tehsil & District, Abbottabad CNIC No.13101-0944332-8 the **Appellant**, do hereby affirm on oath that contents of instant appeal are correct and true to the best of my knowledge and belief and nothing has been suppressed from this Honourable Tribunal and instant appeal is first appeal and same nature of any other appeal is not pending before this Honourable Tribunal.

Dated 24/12/2020

*Shazia Jalil*

DEPONENT

Consequent upon their selection by the Departmental Selection Committee, the Distt: Edu: Officer (Female/Secy:) Abbottabad/Haripur has been pleased to appoint the following Qaria candidates (purely on merit) is hereby ordered/appointed at the school noted against each, in EPS-7 @ RS. 1480-81-2695 and EPS-9 Rs. 1605-97-3060 in case of PA II-Division, plus usual allowances as due and admissible under the rules with effect from the date of their taking over. These subject to the terms and conditions as laid down:-

Sl. No.	Name/Father's Name with Address & D/O Birth.	No. of Merit/Marks obtained	School where appointed.	Remarks.
1.	Shazia Jalil d/o Abdul Jalil H.No.K-376 Moh:Kunj Qadeem, Abbottabad. 09.09.1976.	1/52.41	GGHS Samunder Katha.	Ag: vaca Qaria pos
2.	Farzana Farooq d/o Farooq Khan, Iqbal Town Mandian Atd: 18.2.1972.	2/42.05	GGHS Bearot.	---do---
3.	Safaida Noor d/o Sarwar Hussain, Vill: Kashka, PO Jhangra Atd: 8.3.1977.	3/42.03	GGHS Babot.	---do---

ANNEXURE  
A

Headmaster:  
GGHS Samunder Katha  
ABBOTTABAD.

TERMS AND CONDITIONS:-

01. They will be governed by such Rules & Regulation in force and as may be prescribed by the Govt: from time for the category of Govt: servant to they belong.
02. Their service as will be liable to termination on one month's notice from either side in case of resignation without notice one Month's pay will be forfeited in lieu thereof.
03. The appointment shall stand automatically cancelled if the candidate fails to join the duty within 15 days of the issue of this order.
04. Charge reports should be sent to all concerned and this office as well immediately.
05. They shall be on probation for the period of Two years.
06. The head of institutions are responsible to get verify the certificate Degree etc: from the concerned University/Board/RDE within one month the taking over charge and report of their genuines or otherwise submitted to this office.

Shazia Jalil  
TESTED

(6)

Page No.2.

8. The above appointments are subject to the production the verification of original Degrees/Certificates to the concerned, Principal, or this office any candidate if fails to produce requisite documents should not be allowed to take over charge and report submitted to this office immediately.
9. The appott:shall stand automatically cancelled if the candidate fails to join the duty within 15 days of the issued of this order.
10. They should not be allowed to take over charge if they are below 18 years and above 40 years.
11. No TA/DA and etc is allowed to any one.

(MRS. SABIHA NAHEED)  
DISTT: EDUCATION OFFICER,  
(FEMALE/SECY:) ABBOTTABAD.

Endst: No. 3561-70 /AE-II. Dated the A/Abad 19/4 /1999.

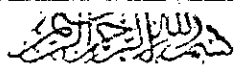
Copy to:-

1. PA to the Director Secy: Edu: NWFP, Peshawar.
2. PS to the Honourable Minister for Edu: NWFP, Peshawar.
- 3-5. The Principal/Headmistresses, concerned.
- 6-8. Candidates concerned.
9. The Distt: Accounts Officer, Abbottabad/Haripur.
10. The A.D.E.O (Accounts) local office.

*Sabiha Naheed*  
DISTT: EDUCATION OFFICER,  
(FEMALE/SECY:) ABBOTTABAD

\*Tariq Khan Jadoon\*

*Juzia Jaleel*



# University of Peshawar

(Pakistan)

Session SUPPLEMENTARY, 1999

ANNEXURE  
B

7

SHAZIA JALIL DAUGHTER of ABDUL JALIL

and a student

of DISTRICT ABBOTTABAD having passed the prescribed

examination held in FEBRUARY, 2000 is this day admitted by the University

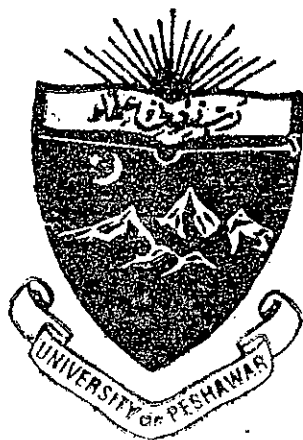
of Peshawar to the Degree of

## Bachelor of Arts

in the SECOND Division

The Examination was taken as a whole / in parts

Serial No. 057864



Registration No. 98-PS-29103

Roll No. 34536

Result declared on APRIL 28, 2000

*Shazia Jalil*  
TESTED

*Amal Khan*  
Registrar

Countersigned  
*2. [Signature]*  
Vice-Chancellor

169

**UNIVERSITY OF PESHAWAR**  
(PAKISTAN)

⑧ No 015213



**DETAILED MARKS CERTIFICATE**

Roll No 345

**B.A. PART-II EXAMINATION 1999** (Annual/Supplementary)

Name Shazia Jabeel

Father's Name Abdul Jalil

Certified that the candidate secured the following marks and is placed in Second Division

**SUBJECTS**

**MARKS OBTAINED**

SUBJECTS	MAXIMUM MARKS	MARKS OBTAINED	
		IN FIGURE	MARKS IN WORDS
1 English	75	24	Twenty four
2 Arabic	75	46	Forty six
3 Islamic Studies	75	31	Thirty one
4 Pakistan Studies	40	19	Nineteen
Part-I marks:	285	136	
<b>TOTAL</b>	<b>550</b>	<b>236</b>	<b>Two hundred &amp; thirty six</b>

**VERIFIED AND FOUND CORRECT**  
Asst. Controller (Secrecy)  
University of Peshawar

**VERIFIED & FOUND CORRECT**

**CONTROLER OF EXAMINATIONS**  
**UNIVERSITY OF PESHAWAR**  
DATE 26.11.2001

Errors & omissions are subject to subsequent rectification

The Examination was taken as-a-Whole / In Parts

RESULT DECLARATION DATE

Date 23.6.2000

Attested  
SS

Assistant Professor  
Govt. Girls College  
Abbottabad

Subject Specialist  
G. G. S. Dhamtoun  
Abbottabad

*Shazia Jalil*  
**ATTESTED**

(9) 5

# Allama Iqbal Open University Islamabad



Serial No: 67966

Certified that Mr. / Ms. SHAZIA

Son / Daughter of ABDUL JALIL

Registration No: 02-NAD-0303 Roll No: L-653913

having completed the prescribed requirements in semester  
**AUTUMN 2003**

is awarded the degree of:

## Bachelor of Education (B.Ed)

He/She has secured 61 % marks and has been placed in B grade.

*Fajr*

CONTROLLER OF EXAMINATIONS

Result declared on: October 14, 2004

ISLAMABAD. DATED: December 27, 2004



*Samira Jil*  
M.Sc.M Ed  
Subject Specialist  
G.G.H.S.S. Dhamsi  
VICE-CHANCELLOR

THIS DEGREE IS TO BE READ IN CONJUNCTION WITH THE TRANSCRIPT, ISSUED SEPARATELY

*Shazia Jalil*  
**TESTED**

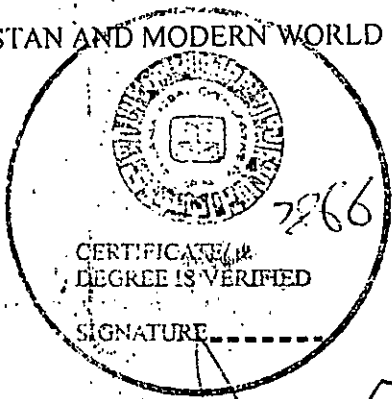
RESULT INTIMATION CARD

Serial No. 121864  
 Registration No. 02NAD0303  
 Roll No. L653913

Certified that Mr/Ms. SHAZIA JALIL  
 Father's Name ABDUL JALIL  
 has Successfully Completed the B.ED(ARTS)  
 programme. The detail of course is as under

Address:- 11/NO K 775 KUNJ QUDEEM, ABBOTTABAD DIST. ABBOTTABAD

Semester	Course Code	Title of the Course	Marks	
			Maximum	Obtained
SPR- 03	0654	TEACHING OF ISLAMIAT	100	67
SPR- 03	0658	TEACHING OF URDU	100	72
SPR- 02	0513	SCHOOL ORGANIZATION MANAGMENT	100	60
SPR- 02	0514	EVALUATION, GUIDANCE & RESEARCH	100	57
SPR- 02	0518	EDUCATIONAL TECHNOLOGY & CURR:	100	52
SPR- 02	0651	ENGLISH (C)	100	55
SPR- 03	0512	PROSPECTIVE OF EDUCATION	100	56
AUT- 03	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	58
SPR- 03	0655	WORKSHOP	100	75



Total Credit Hours \*\*  
 Total AIOU Credits 6  
 Result declared on October 14, 2004  
 Date of Issue: DEC 27 2004

Total Marks Obtained 900 552  
 Percentage Marks 61 B

*Handwritten signature*

M.Sc/M  
 Subject Specialist (BPS)  
 G.G.H.S.S. Cham...

*Handwritten signature*  
 Controller of Examinations

Note: This result card is issued as a notice only; errors and omissions are excepted. An entry appearing in it does not in itself confer any right or privilege independently to the grant of proper certificate/degree which will be issued under the Regulations in due course of time.

*Handwritten signature*  
**TESTED**





Nuzhat Ahmad  
Siddiqui = 03335078397

(11)

ANNEXURE  
C

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

Dated Peshawar, 11.07.2012.

**NOTIFICATION:****No. SO (B & A)/1-18/E&SE/2012:**

Sanction of the Government of Khyber Pakhtunkhwa is hereby accorded to the up gradation of the posts for Grant of Incentive of Higher Pay Scale to different Categories/Cadres of teachers in Elementary & Secondary Education Department w.e.f. 01-07-2012 as per details given below:-

No.	Nomenclature of Teaching Cadre Post	Location	Existing Basic Pay Scale	Now Approved Basic Pay Scale	Remarks
1.	Primary School Teacher (PST)	Govt. Primary School	BPS-5 BPS-6 BPS-7 BPS-9 BPS-10 BPS-12	(BPS-12)	The post of PST is upgraded to BPS-12. Accordingly, 33,497 posts of PSTs, already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.
2.	Senior Primary School Teacher (Sr. PST)	"do"	Newly Upgraded/Redesignated Post	(BPS-14)	22,331 posts of the existing PSTs in various existing pay scales are upgraded to BPS-14 and redesignated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
3.	Primary School Head Teacher (PSHT)	"do"	Newly Upgraded/Redesignated Post	(BPS-15)	20,804 posts of the existing PSTs (one post in each Primary School) are upgraded to BPS-15 and redesignated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
4.	Certified Teachers (CT)	Govt. Middle/High/Higer Secondary School	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of CTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
5.	Senior Certified Teachers (Sr. CT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total CT posts are upgraded to BPS-16 and redesignated as Senior CTs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
6.	Arabic Teachers (A.T)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of ATs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
7.	Senior Arabic Teachers (Sr. AT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total AT posts are upgraded to BPS-16 and redesignated as Senior AT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
8.	Teacher of Theology (TT)	"do"	BS-07 BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of TTs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
9.	Senior Teacher of Theology (Sr. TT)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total TT posts are upgraded to BPS-16 and redesignated as Senior TT, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
10.	Drawing Masters (DM)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of DMs are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
11.	Senior Drawing Masters (Sr. DM)	"do"	Newly Upgraded/Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total DM posts are upgraded to BPS-16 and redesignated as Senior DM, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

*Shazia Jaleel*  
**ATTESTED**

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12.	Physical Education Teachers (PET's)	"do"	BS-09 BS-10 BS-12 BS-14 BS-15	(BPS-15)	All the existing posts of PET's are upgraded to BPS-15 for the present incumbents to the post as well as future appointees.
13.	Senior Physical Education Teachers (Sr. PET's)	"do"	Newly Upgraded/ Redesignated Post	(BPS-16)	One thirds (1/3 <sup>rd</sup> ) of the total PET's posts are upgraded to BPS-16 and redesignated as Senior PET, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.
14.	Qari/Qaria	"do"	DPS-7 BPS-9 BPS-10 BPS-14 BPS-15	(BPS-12)	All the existing posts of Qari/Qaria are upgraded to BPS-12 for the present incumbents to the post as well as future appointees.
15.	Sr.Qari/Sr.Qaria	"do"	Newly Upgraded/ Redesignated Post	(BPS-15)	One thirds (1/3 <sup>rd</sup> ) of the total Qari/Qaria posts are upgraded to BPS-15 and redesignated as Senior Qari/Qaria, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any, for the post.

2. . . A policy shall also be devised in the framework of input/output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.

3. District wise/ school wise breakup of the posts is enclosed herewith as Annexure-A.

SECRETARY

Endst: No. SO(FR)/FD/10-22(E)/2010 Dated Pesh: the 16/07/2012

Copy is forwarded to Accountant General, Khyber Pakhtunkhwa, Peshawar.  
All District Account Officers

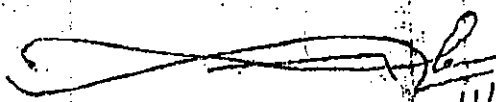
  
SECTION OFFICER (FR)  
FINANCE DEPARTMENT

Endst. Of even Number & Date.

Copy of the above is forwarded to:-

1. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department, with reference to his letter No SO(FR)/FD/10-22(E)/2010 dated 26.06.2012.
2. P.S. to Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
3. P.S. to Special Secretary, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
4. P.S. to Deputy Secretary-II, E&SE Department, Khyber Pakhtunkhwa, Peshawar.
5. P.S. to Minister of E&SE, Khyber Pakhtunkhwa.
6. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
7. All the Executive District Officers, E&SE, Khyber Pakhtunkhwa.
8. The Managing Director, Printing Press, Khyber Pakhtunkhwa, Peshawar.
9. Master file.

  
ATTESTED

  
(NOOR ALAM KHAN WAZIR)  
SECTION OFFICER (B&A)  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SO(PE)4-5/Meeting/2013/Teaching Cadre  
Peshawar, dated the 20th December, 2013.

To

The Director,  
Elementary and Secondary Education,  
Khyber Pakhtunkhwa Peshawar.

Subject: Filling of Vacant Posts in Higher Secondary  
Schools/High / Middle/ Primary.

I am directed to convey the approval of the Competent Authority for filling of Vacant posts in BPS-16 and BPS-15 and below in HSS/High/Middle and Primary School in the following manner.

a) Vacant Posts in BPS-16.

1. The following 4545 posts of Teaching Cadre SST (Bio, Maths, General etc) falling in B-16 are lying vacant throughout the province District wise detail is as under:-

S.No.	District	SST SCIENCE Bio / Chem B-16		SST SCIENCE Maths / Phy B-16		SST General B-16		Total		Total
		M	F	M	F	M	F	M	F	
3	Abbott Abad	53	16	42	40	(44)	(18)	39	74	211
4	Banju	16	21	51	21	0	64	67	106	172
5	Batta Gram	27	6	25	6	28	22	31	34	115
6	Buner	18	19	58	23	80	49	156	91	247
7	Charsadda	28	12	45	33	34	26	107	71	178
8	Chitral	20	0	45	15	23	0	88	15	103
9	DI Khan	60	10	56	41	61	0	177	51	228
10	Dir Lower	40	27	40	39	60	72	140	138	278
11	Dir Upper	31	6	38	7	91	11	160	24	184
12	Hangu	24	9	26	9	34	28	34	46	130
13	Haripur	61	5	20	40	70	36	151	81	232
14	Karak	19	13	16	23	23	16	58	52	110
15	Kohat	36	6	40	25	91	39	167	70	237
16	Kohistan	24	1	31	1	121	23	176	25	201
17	Lakki Marwai	33	11	34	19	15	30	32	60	142
18	Malakand	17	9	5	27	1	1	23	37	60
19	Manshura	55	15	51	31	79	45	135	101	236
20	Mardan	37	21	41	56	27	52	165	139	304
21	Nowshera	37	37	42	30	92	33	171	100	271

Director (PE) S.D.E (H) (1)

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Shuja Tahir

22	Peshawar	43	0	55	22	42	8	140	30	170
23	Shangla	24	5	33	5	41	21	98	31	129
24	Swabi	55	12	38	54	74	52	168	118	286
25	Swat	22	11	45	25	13	13	80	49	129
26	Turk	22	3	23	7	39	15	84	25	109
27	Toor Gher	3	0	4	0	32	1	39	1	40
Total Vacancies		806	275	905	609	1275	675	2986	1559	4545

2. According to the existing Recruitment Rules these vacancies may be filled in the following manner

Method of Recruitment	SST SCIENCE Bio/Chem B-16		SST SCIENCE Maths/Phy B-16		SST General B-16		Total		Total
	M	F	M	F	M	F	F	M	
25% Initial Recruitment	201	6	226	152	320	16	747	386	1,130
40% by promotion from S CT/CT	322	110	362	244	510	270	1,194	614	1,818
20% by promotion from PSHT/SPST/PST	161	55	181	122	255	135	597	312	909
4% by promotion from SDM/DM	32	11	36	24	51	27	119	62	182
4% by promotion from SAT/AT	32	11	36	24	51	27	119	62	182
4% by promotion from STT/IT	32	11	36	24	51	27	119	62	182
3% by promotion from S.Qari/Qari	24	9	27	18	38	20	90	47	130
Total	806	275	905	609	1,275	675	2,986	1,559	4,545

3. In pursuance of the Approval of the Competent Authority, the following post be advertised on adhoc school-based.

District	SST/SC Bio /Chem B-16		SST/SC Maths/Phy B-16		SST Arts B-16		Total		Total
	M	F	M	F	M	F	M	F	
Abbott Abad	13	4	10	10	11	5	34	19	53
Banmu	4	5	13	5	-	16	17	26	43
Batta Gram	6	2	7	2	7	6	20	10	30
Buner	5	4	14	6	20	12	39	22	61
Charsadda	7	3	11	8	9	6	27	17	44
Chitral	5	0	11	4	6	0	22	4	26
DI Khan	15	2	14	10	15	0	44	12	56
Dir Lower	10	7	10	10	15	17	35	34	69
Dir Upper	8	2	9	2	23	3	40	7	47
Hangu	6	2	7	2	9	7	21	11	32
Haripur	15	1	5	10	17	9	37	20	57
Karak	5	3	4	6	6	4	15	13	28
Kohat	9	1	10	6	23	10	42	17	59
Kohistan	6	0	8	0	30	6	44	6	50
Lakki Marwat	8	2	8	4	4	7	20	13	33
Mulakand	4	2	1	6	0	0	6	8	14

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Mansehra	14	4	13	10	20	11	46	25	71
Mardan	9	5	10	14	22	13	41	32	73
Nowshera	9	9	11	8	23	8	43	25	66
Peshawar	11	0	14	6	11	2	35	8	43
Shangla	6	1	8	1	10	5	25	7	32
Swabi	14	3	10	13	18	13	42	29	71
Swat	6	3	11	6	3	3	20	12	32
Tank	5	1	6	2	10	4	20	7	27
Toor Gher	-	0	1	0	8	0	9	-	9
<b>Total</b>	<b>200</b>	<b>66</b>	<b>226</b>	<b>154</b>	<b>320</b>	<b>167</b>	<b>746</b>	<b>384</b>	<b>1,130</b>

4. The above Vacancies may be filled in the following manner :-

S.No	NOMENCLATURE	MINIMUM QUALIFICATION AND EXPERIENCE FOR INITIAL APPOINTMENT OR BY TRANSFER	AGE LIMIT
1.	Secondary School Teacher (Maths Physics) (B-16)	At least Second class Bachelor's Degree from a recognized University with the following Two subject I. (Physics, II. Maths A or B or Statistics ) and Bachelor of Education or Master of Education (Industrial art or Business Education) or M.A Education or equivalent qualifications from a recognized University.	21 to 35 Years
2.	Secondary School Teacher (Bio, Chem) (B-16)	At least Second class Bachelor's Degree from a recognized University with the following Two subject I. Chemistry, II. (Botany or Zoology), and Bachelor of Education or Master of Education (Industrial art or Business Education) or M.A Education or equivalent qualifications from a recognized University.	21 to 35 Years
3	Secondary School Teacher (General) (B-16)	At least Second class Bachelor's Degree from a recognized University with the following Two subject in Humanities and other equivalent groups at degree level with English as Compulsory Subject. and Bachelor of Education or Master of Education (Industrial art or Business Education) or M.A Education or equivalent qualifications from a recognized University.	21 to 35 Years

**Selection Criteria**

- I. Appointment through initial recruitment on adhoc shall be made through Merit on School base.
- II. For selection of suitable candidate by initial recruitment, Total 200 marks shall be distributed in the following manner:-
  - (a) Screening Test conducted by Independent third party(NTS)= 100 Marks
  - (b) Academic Qualification = 100 Marks
 These 100 marks will be further distributed as under:-

**ATTESTED**  
Shazia Jaleel

Category of Qualification	(Total marks 100)
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
BA/ BSc	Marks obtained X 20 / total marks =
MA/MSc	Marks obtained X 15 / total marks =
Minimum Professional qualification required for posts	Marks obtained X 15 / total marks =
M.Ed / MA Edu	Marks = 05
MPhil/PhD	Marks obtained X 5 / total marks =

5. Meeting with NTS authorities may be conducted. NTS will charge Rs.300/- per Application form: is one candidate apply for 5 schools then the NTS will charge Rs.1200/- for 5 Application form and the NTS fee will be borne by the candidates.
6. The remaining 3409 vacancies may be filled through promotion from the concerned districts with following break up under the Revised Recruitment Rules 2013 as SSRC has been conducted and Minutes have been signed by all the members and a note to Chief Secretary is being moved.

District	SST/SC Bio /Chem B-16		SST/SC Maths /Phy B-16		SST/General B-16		Total		Total
	M	F	M	F	M	F	M	F	
40% by promotion from S CT/CT	322	110	362	244	510	270	1,194	624	1,818
20% by promotion from PSHT/SPST/PST	161	55	181	122	255	135	597	312	909
4% by promotion from SDM/DM	32	11	36	24	51	27	119	62	182
4% by promotion from SAT/AT	32	11	36	24	51	27	119	62	182
4% by promotion from STT/TT	32	11	36	24	51	27	119	62	182
3% by promotion from S.Qari/Qari	24	8	27	18	38	20	90	47	136
<b>Total</b>	<b>603</b>	<b>206</b>	<b>678</b>	<b>456</b>	<b>956</b>	<b>506</b>	<b>2238</b>	<b>1169</b>	<b>3409</b>

**b) Vacant Posts in BPS-15 and Below.**

The vacant posts in BPS-15 and below should be advertised on adhoc school-based through NTS as per the following selection criteria, Nomenclatures of the posts, Qualification, Age will remain the same as per existing Service rules, and the process of appointment in those districts where the posts have already been advertised under the existing rules be stopped and the advertisement may be withdrawn to avoid litigation.

**Selection Criteria**

Appointment through initial recruitment on adhoc shall be made through Merit on School base for selection of suitable candidate by initial recruitment, Total 200 marks shall be distributed in the following manner: -

- (a) Screening Test conducted by Independent third party(NTS)= 100 Marks
- (b) Academic Qualification = 100 Marks

These 100 marks will be further distributed as under:-

APPROVED  
Shajee Jaleel

Category of Qualification	(Total marks 100)
SSC	Marks obtained X 20 / total marks =
HSSC	Marks obtained X 20 / total marks =
BA/ BSc	Marks obtained X 20 / total marks =
MA/MSc	Marks obtained X 15/ total marks =
Minimum Professional qualification required for posts	Marks obtained X 15/ total marks =
M.Ed / MA Edu	Marks = 05
MPhil/PhD	Marks obtained X 5/ total marks =

*[Signature]*  
SECTION OFFICER  
(Primary)

Endst : of even No & date:

1. The Director, Curriculum and Teacher Education Khyber Pakhtunkhwa Abbottabad.
2. The Director, (PTE) Khyber Pakhtunkhwa Peshawar.
3. The Director, ESRU Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar.
4. All District Education Officer (M&F) in Khyber Pakhtunkhwa.
5. PS to Chief Minister Khyber Pakhtunkhwa Peshawar.
6. PS to Chief Secretary Khyber Pakhtunkhwa Peshawar.
7. PS to Minister E&SE Khyber Pakhtunkhwa Peshawar.
8. PS to Secretary E&SE Khyber Pakhtunkhwa Peshawar.
9. Master file

*[Signature]*  
SECTION OFFICER  
(Primary)

**ATTESTED**  
*Shazia Jaleel*



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

18

ANNEXURE  
E

**NOTIFICATION**

Consequent upon the recommendations of Departmental Promotion Committee and in pursuance of the Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar Notification bearing Endst No: 2527-30 /File No.02/Promotion SST B-16 dated 11/05/2016, the following SCTs/CTs,SDMs/DMs,SATs/ATs,STTs/TTs, Senior Qarias/Qarias, PSHTs/SPSTs/PSTs on promotion as **SST (General) BPS-16 @ (Rs: 12910-1035-43960)** plus usual allowances as admissible on regular basis are hereby adjusted against the Vacant Post noted against each in the interest of public service from the date of taking over charge.

S#	S/L No	Name of Teacher /Designation	Name of Previous School	Promoted as SST (G) /Place of posting	Remarks
1	04	Shazia Zain (SCT)	GGHSS Havelian	GGHS Ghari Phulgaran	A.V.P. of SST (G)
2	22	Farkhanda Sherin (SCT)	GGHSS Atd	GGMS Bandi Chimyali	-do-
3	32	Musarat Rani (SCT)	GGCMS Nawansher	GGMS Makol Payeen	-do-
4	33	Simab Khalil (SCT)	GGHS Bandi Phullan	GGHS Bandi Matrach	-do-
5	34	Tasleem Jan (SCT)	GGHSS Havelian	GGMS Kiyala Payeen	-do-
6	35	Ruqayia Bibi (SCT)	GGHSS Havelian	GGMS Karach	-do-
7	36	Rubina Trimzi (SCT)	GGHS Rajoya	GGMS Nalotha	-do-
8	38	Jamila Begum (SCT)	GGHSS Havelian	GGHS Ban Nara	-do-
9	39	Shazia Bano (SCT)	GGHSS Hajla Gali	GGMS Chamhad	-do-
10	40	Rubina Awan (SCT)	GGHSS Havelian	GGMS Satora	-do-
11	41	Rafia Bashir (SCT)	GGHS Mirpur	GGHS Hall Maira	-do-
12	44	Samina Tabasum (SCT)	GGHSS Comp: A/Abad	GGHS Sajikot (Q)	-do-
13	05	Naseem Bano (SDM)	GGHSS Comp: A/Abad	GGHS Sultanpur	-do-
14	21	Amat-us-Saeed (SAT)	GGHS Kunj	GGHS Berran Gali	-do-
15	43	Shagufta Nazli (STT)	GGHS Mirpur	GGHS Jarral	-do-
16	23	Attia Nishan Abasi (SQaria)	GGHS Beeran Gali	GGHS Bakote	Vice Mst Ruqia Sultana SST (G) GGHS Bakote
17	96	Naheed Kousar (PSHT)	GGPS Jabbar	GGMS Kakote	-do-
18	99	Bibi Nayar Sultana (PSHT)	GGPS Hav: Station	GGCMS Samwala	-do-
19	111	Tabassum Shaheen (PSHT)	GGPS Kunj	GGMS Bandi Kalu	-do-
20	116	Azra Bibi (PSHT)	GGPS Upper Kehal	GGCMS Danna	-do-
21	126	Nasreen Akhtar (PSHT)	GGPS Mohar Khurd	GGHS Khanispur	-do-
22	67	Noreen Rashid (PSHT)	GGPS Gehal Qazian	GGMS Tatreela	-do-

**Consequential Adjustment**

Sr.#	Name of Teacher	Name of Previous School	Place of Posting	Remarks
1	Ruqia Sultana SST (G)	GGHS Bakote	GGHS Beran Gali	A.V.P. of SST (G)

**TERMS & CONDITIONS:**

1. They would be on probation for a period of one year extendable for another one year.

**SOHAIL**  
BOOKS & PHOTOSTATE  
Link Road Band Kho Abbottabad  
Cell: 0344-9443494, 0334-8997928

**ATTESTED**  
Shazia Jalil



2. They will governed by such rules and regulations as may be issued from time to time by the Government.
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 time to time
4. Charge Report should be submitted to all concerned.
5. Their inter Se- Seniority on lower post will remain intact.
6. No TA/DA is allowed for joining her duty.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment is made to them in the light of this office will be recovered if they were wrongly promoted, they will be reversed
8. Before handing over charge once again their documents may be checked if they have not the required relevant qualification as per rules they may be handed over charge of the post.

*Sammal*  
 DISTRICT EDUCATION OFFICER  
 (FEMALE) ABBOTTABAD  
 13/05/2016  
 Dated A.Abad: the 13/05/2016

Endst: No. 2889-95 / EB-I/ Transfer/Adjustment  
 Copy to the:-

1. PS to Secretary to Govt: of KPK, E & SE, KPK, Peshawar.
2. Director, E & SE, KPK, Peshawar.
3. District Accounts Officer Abbottabad.
4. Budget and Accounts Officer Local Office.
5. Principals Concerned.
6. Teachers concerned.
7. K.P.O local office.

*Sammal*  
 DISTRICT EDUCATION OFFICER  
 (FEMALE) ABBOTTABAD  
 13/5/2016

**SOHAIL**  
 BOOKS & PHOTOSTATE  
 Link Road Band Kho Abbottabad  
 Cell: 0344-9443494, 0334-8997928

**ATTESTED**  
*Shajia Jalil*



## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9225340- 9225341,  
9225338, 9225339

Fax 091-9225345

E-mail rafiq\_kk851@yahoo.com

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### 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(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) noted against each BPS-16 (Rs. 18910-1520-64510) 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 by the District Education Officer concerned.

#### **A. SST (Bio Chem)**

##### **1. PROMOTION OF SCT/CT TO SST (Bio Chem) BPS-16.**

Total No. of SST General (F) Posts vacant Posts	08
25% share initial recruitment	02
75% share for Promotion.	06
20% Share of promotion of SCT/CT	03
Posts available for promotion	03
Promoted through this order	01

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular SCT	Qualification	Remarks
1	7	Shamila Kiran GGCHSSA.Abad	29-12-1986	27-04-2012	BA/B.Ed	Services placed at the disposal of DEO (M) Abbottabad for further posting against SST (Bio Chem) post.

#### **A. SST (General)**

##### **1. PROMOTION OF SCT/CT TO SST (General) BPS-16.**

Total No. of SST General (F) Posts vacant Posts	33
25% share initial recruitment	04
75% share for Promotion.	29
20% Share of promotion of SCT/CT	13
Posts available for promotion	13
Promoted through this order	13

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular SCT	Qualification	Remarks
1	7	Neelofar Shaheen GGCHSSA.Abad	30-7-1960	11-12-1988	BA/B.Ed	Services placed at the disposal of DEO (M) Abbottabad for further posting against SST (General) post.
2	10	Shazia Zaman GGHS No.1 A.Aad	12-5-1969	02-2-1991	BA/B.Ed	-----do-----
3	14	Ghazala Shaheen GGHS Kunj	06-9-1966	11-5-1992	BA/B.Ed	-----do-----
4	17	Nabila Bibi GGHS No.2 A.Abad	04-4-1971	16-5-1992	BA/B.Ed	-----do-----
5	26	Asma Bibi GGCMS Nawan Sherh	01-7-1970	20-5-1992	BA/B.Ed	-----do-----
6	31	Mussarat Rani GGCMS Nawan Sherh	29-9-1966	15-8-1992	BA/B.Ed	-----do-----
7	48	Rubina Farid GGCMHS No.1 A.Abad	01-9-1968	08-11-1994	BA/B.Ed	-----do-----

**ATTESTED**  
Shazia Jalil

8	66	Aisha GGCHSS A. Abad	21-4-1968	09-1-1995	BA/B.Ed	-----do-----
9	68	Farzana Bibi GGHSS Dhamtour	05-5-1969	09-1-1995	BA/B.Ed	-----do-----
10	69	Rizwana Shaheen GGHS Kunj	24-4-1974	26-2-1995	BA/B.Ed	-----do-----
11	70	Nasim Sadiq GGHS Samandar Katha	04-3-1971	25-5-1995	BA/B.Ed	-----do-----
12	71	Imrazia Khatoon GGCHSS A. Abad	12-1-1969	13-6-1995	BA/B.Ed	-----do-----
13	72	Shahida Bibi GGHS Jhangi	23-3-1970	01-9-1995	BA/B.Ed	-----do-----

**2. PROMOTION OF SDM/DM TO SST (General) BPS-16.**

Total No. of SST General (F) Posts vacant Posts	33 ✓
25% share initial recruitment	04 8
75% share for Promotion.	29 15 25
20 % Share of promotion of SDM/DM	01 2
Posts available for promotion	01 2
Promoted through this order	01 1

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular SDM	Qualification	Remarks
1	10	Shagufta Iqbal GGHS Sajikote	25-12-1973	01-11-1996	BA/B.Ed	Services placed at the disposal of DEO (M) Abbottabad for further posting against SST (General) post.

**3. PROMOTION OF PSHT/SPST/PST TO SST (General) BPS-16.**

Total No. of SST General (F) Posts vacant Posts	33 ✓
25% share initial recruitment	04 4
75% share for Promotion.	29
20 % Share of promotion of PSHT/SPST/PST	07
Posts available for promotion	07
Promoted through this order	07

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular PST	Qualification	Remarks
1	144	Qudsia Kanwal GGPS Shadial	10-5-1975	16-3-1995	BA/B.Ed	Services placed at the disposal of DEO (M) Abbottabad for further posting against SST (General) post.
2	145	Shazia Bibi GGPS Pangora	02-3-1973	18-3-1995	BA/B.Ed	-----do-----
3	146	Abida Parveen GGPS Paswal No.1	02-3-1973	01-4-1995	BA/B.Ed	-----do-----
4	159	Chan Fiaz GGPS Maira Payeen	25-9-1975	8-11-1995	BA/B.Ed	-----do-----
5	162	Samia Jabeen GGPS B.A. Jabbar	10-8-1975	13-11-1995	BA/B.Ed	-----do-----
6	164	Khateebun Nisa GGPS Kuthwal	22-1-1972	29-11-1995	BA/B.Ed	-----do-----

**4. PROMOTION OF SAT/AT TO SST (General) BPS-16.**

Total No. of SST General (F) Posts vacant Posts	33
25% share initial recruitment	04
75% share for Promotion.	29
20 % Share of promotion of SAT/AT	02
Posts available for promotion	02
Promoted through this order	02

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appoint: as Regular PST	Qualification	Remarks
1	16	Khamna Ejaz	13-3-1972	14-2-1996	BA/B.Ed	Services placed at the

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Shazia Jalil

		GGHS Dhodial				disposal of DEO (M) Abbottabad for further posting against SST (General) post.
2	24	Aniqa Bano GGHS Kuthwal	13-5-1972	26-6-1997	BA/B.Ed	-----do-----

**5. PROMOTION OF STT/TT TO SST (General) BPS-16.**

<b>Total No. of SST General (F) Posts vacant Posts</b>		<b>33</b>
<b>25% share initial recruitment</b>		<b>04</b>
<b>75% share for Promotion.</b>		<b>29</b>
<b>20 % Share of promotion of STT/TT</b>		<b>02</b>
<b>Posts available for promotion</b>		<b>02</b>
<b>Promoted through this order</b>		<b>02</b>

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular STT	Qualification	Remarks
1	60	Shamila Rafique GGCMHS Nawan Shehr A.Abad	01-4-1980	21-2-2013	BA/B.Ed	Services placed at the disposal of DEO (M) Abbottabad for further posting against SST (General) post.
2	73	Shahida Jabeen GGHS Samandar Katha A.Abad	17-1-1985	21-2-2013	BA/B.Ed	-----do-----

**6. PROMOTION OF SQaria/Qaria TO SST (General) BPS-16.**

<b>Total No. of SST General (F) Posts vacant Posts</b>		<b>33</b>
<b>25% share initial recruitment</b>		<b>04</b>
<b>75% share for Promotion.</b>		<b>29</b>
<b>20 % Share of promotion of SQaria/Qaria</b>		<b>01</b>
<b>Posts available for promotion</b>		<b>01</b>
<b>Recommended for Promotion</b>		<b>01</b>

S.No	S.L No	Name of Official & Present Place of Posting	Date of Birth	Date of Appott: as Regular SQaria	Qualificati	Remarks
1	21	Nasreen Bibi GGHS Kakul	02-3-1979	04-12-2003	BA/B.Ed	Services placed at the disposal of DEO (M) Abbottabad for further posting against SST (General) post.

**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 preceded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining 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 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.

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.5694-5700  
Endst: No. / File No.2/Promotion SST B-16: Dated Peshawar the 22/12/2017.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer concerned
3. District Accounts Officer concerned
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)

Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

\*/Noor/\*

ATTESTED  
Shajee Jalal

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD**



☎ 0992-342533, 0992-342314  
✉ Dcofemale.abbottabad@gmail.com

**NOTIFICATION**

Consequent upon the recommendations of Departmental Promotion Committee and in pursuance of the Khyber Pakhtunkhwa Elementary and Secondary Education Department Peshawar Notification bearing Endst.No. 4118-23/A-17 DPC-2019 KPK dated 02/03/2020, the following female CT, SCT are promoted to post SST(G) BPS-16 @ Rs.(10910-1520-64510) plus usual allowances as admissible on regular basis are hereby adjusted in school noted against each their name w.e.f 02.03.2020.

**Promotion of SCT/CT to SST(Bio/Chem) BPS-16 on Regular Basis.**

S#	S/L No.	Name of Teacher/Designation	Name of Previous School	Promoted as SST and Place of Posting	Remarks
1	113	Kiran Zeb, CT	GGHS Havelian Vill: Abbottabad	GGHS Jhanji Atd	A.V.P of SST (B/C)
2	70	Aysha Maqsood, DM	GGHS Pind Kargu Khan Atd	GG Comp:ISS Atd	A.V.P of SST (B/C)

**SST (Math/Phy):**

**Promotion of SCT/CT to SST(Bio/Chem) BPS-16 on Regular Basis.**

S#	S/L No.	Name of Teacher/Designation	Name of Previous School	Promoted as SST and Place of Posting	Remarks
1	88	Mehnaz Liaqat, CT	GGHS Upper Kehal, Atd	GGHS Bagnotar Atd	A.V.P of SST (Math/Phy)

**SST (General)**

**Promotion of SCT/CT to SST(General) BPS-16 on Regular Basis.**

S#	S/L No.	Name of Teacher/Designation	Name of Previous School	Promoted as SST and Place of Posting	Remarks
1	25	Shabeen Akhter (SCT)	GGHS Birote Abbottabad	GGHS Birote Atd	A.V.P of SST (G)
2	31	Bibi Taskeen (SCT)	GGHSS Dharmtour Atd	GGHS Aziz Bang Atd	A.V.P of SST (G)
3	44	Simab Khalil (SCT)	GGHS No.2 Atd	GGCMS Deval Atd	A.V.P of SST (G)
4	43	Gul Shad (SCT)	GGHS Havelian Vill: Atd	GGMS Chammak Maira	A.V.P of SST (G)
5	56	Rukshana Gegum (SCT)	GGHS No.2 Atd	GGMS Kari Sarafali Atd	A.V.P of SST (G)
6	78	Anila Begum (SCT)	GGHS Sahad Atd	GGMS Langrial Atd	A.V.P of SST (G)
7	93	Dilfaraz Bibi (SCT)	GGHS Kokal Harseen Atd.	GGCMPS Samwala Atd	A.V.P of SST (G)
8	96	Raheela Khanum, (SCT)	GGCMSS (No.1) Atd Atd	GGMS Riyala (Mumtazabad) Atd	A.V.P of SST (G)
9	97	Farah Naz Jadoon, SCT	GGHSS Malikpura Atd	GGHS Jural Atd	A.V.P of SST (G)
10	19	Sajida Bibi, (SDM)	GGHSS Abbottabad	GGHS Tajwal Atd	A.V.P of SST (G)
11	25	Nighat Yasmeen, (SAT)	GGHS No.2 Abbottabad	GGMS Satara Atd	A.V.P of SST (G)
12	56	Saima Bibi, (S-T)	GGHS Sultanpur Atd	GGMS Hirlan Mirjan Atd	A.V.P of SST (G)
13	03	Uzma Rasheed, (S-Qaria)	GGHS Handi Maira	GGMS Kakas Atd	A.V.P of SST (G)
14	211	Zareen Jan, (PSHT)	GGPS Samasir, Atd	GGMS Nareoka Atd	A.V.P of SST (G)
15	236	Rifat Jabeen, (PSHT)	GPS Pateel Atd	GGMS Tareela Atd	A.V.P of SST (G)
16	249	Sadia Shamir, (PSHT)	GGPS Gah Bagnotar Atd	GGMS Bagan Atd	A.V.P of SST (G)
17	254	Fakhra Jabeen, (PSHT)	GGPS Paswal Mian Atd	GGHS Havelian Village	A.V.P of SST (G)
18	261	Asia Imtiaz, (PSHT)	GGPS Bakora, Atd	GGHSS Lora Atd	A.V.P of SST (G)

**SOHAIL**  
BOOKS & PHOTOSTATE  
Link Road Band Kho Abbottabad  
☎ 0344-3443494, 0334-8997928

**ATTESTED**  
*Shajia Jaleel*

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CONSEQUENTIAL ADJUSTMENT OF SST(G)

S.No	Name of Teacher	Present station	Place of posting	Remarks
1.	Wajiha Hajab, SST(G)	GGHS Birote Atd	GGCMS (No.1) A/D	Against vacant post of SST(G)
2	Schrish Maqbool, SST(G)	GGMS Gali Meeran Atd	GGMS Langru Atd	Against vacant post of SST(G)
3	Tabsum Shaheen SST (G)	GGHS Khanispur Ayubia	GGCMS No. 01 Atd	Against vacant post of SST(G)
4	Patima Ajab, SST(Bio/Chem)	GGHS Banda Pir Khan	GGHS Mirpur	Against vacant post of SST(Bio/Chem)

TERMS & CONDITIONS

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
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 TA/DA is allowed for joining their 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 them, in light of this order will be recovered and if they wrongly promoted, they will be reversed.
8. Before handing over charge once again their document may be checked and if they have not possessed the required relevant qualifications as per rules, they will not be handed over charge of the post.

*[Signature]*  
District Education Officer  
(Female) Abbottabad

Indst. No. 1541-50 /BB-1/Vol-IV/Prom S-CT to SST 2019 dated 5/3/2020

Copy for information to the:-

1. PS to secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
2. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.
3. Deputy Director (Establishment) Directorate of E&SE Peshawar.
4. District Account office Abbottabad.
5. B&AO Local office.
6. Principal/Head Mistress concerned schools.
7. Official concerned.
8. SDBO (Female) Abbottabad and Havelian.
9. EMIS Branch.
10. Office file.

*[Signature]*  
District Education Officer  
(Female) Abbottabad

05/3/2020

**TESTED**  
*Shajira Jalil*



# OFFICE OF THE DISTRICT EDUCATION

## OFFICER (FEMALE) ABBOTTABAD

PH# No. 0992-342533 Fax:0992-342314

E-mail [deofemale\\_abbottabad@yahoo.com](mailto:deofemale_abbottabad@yahoo.com)

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ANNEXURE  
F

### NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification issued vide No. SO (B&A) 1-18/E&SE/2012 dated 11/07/2012 and Finance Department Endst No. SO (FR)/FD/10-22( E/2010) dated 16/07/2012, and in pursuance of the amended Notification No: SO (PE)4-5/SSRC/meeting2013/teaching cadre dated 24/03/2013, the following female Qaria BPs-12 are hereby upgraded to the post of Senior Qaria BPs-15 @ Rs. (16120-1330-56020) plus usual allowances as admissible under the rule with the terms and conditions given below in the interest of public service w.e.f 12/01/2018.

S.No	S/L No	Name of Teacher	School Name	New place of Posting	REMARKS
1	14	NAHEED ANWAR	GGHSS Lora	GGHSS Lora	Promoted and Posted in same School
2	15	SHAZIA JALIL	GGHSS Dhamtour	GGHSS Dhamtour	Promoted and Posted in same School
3	19	HABIB UN NISA	GGHS Kuthwal	GGHS Kuthwal	Promoted and Posted in same School

### Terms and Conditions:-

1. On their promotion/Upgradation, the teachers concerned will be on probation for a period of 01 year in terms of section-6(2) of Khyber Pakhtunkhwa, civil servant Act 1973 read with rule 15 (1) of Act of servant ( appointment, promotion/Upgradation and transfer rules 1981).
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated at any time, in case their performance is found under the rules.
4. Their inter-se-seniority on lower post will be remained intact.
5. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to them-will be recovered from them if they are wrongly promoted and they will be reversed.
6. They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within stipulated period, their promotion will be expired automatically and no sub-sequent appeals will be entertained.
7. Necessary entry should be recorded in their service books.
8. Charge report should be submitted to all concerned.
9. Checking of verification of all the documents shall be ensured by the DDO concerned.
10. No TA/DA is allowed.

*[Signature]*  
District Education Officer  
(Female) Abbottabad

Endst No: 1033-37 EB-III/

Dated: 8 / 08 / 2018

### Copy for Information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account officer Abbottabad.
3. Concerned Principal/Head Mistress.
4. Official Concerned
5. Office file.

*[Signature]*  
District Education Officer  
(Female) Abbottabad

ATTESTED

*[Signature]*  
Shazia Jalil

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ANNEXURE  
9

To,

Secretary Elementary & Secondary Education,  
Department Khyber Pakhtunkhwa,  
Peshawar.

Subject: *Departmental Appeal Under Govt of KPK Civil Servant Rules " Right to Appeal" U/S-03-1 of 1986 for promotion of the appellant from S/Qaria BPS-15 to SST (G) post BPS-16.*

Respected Sir,

Facts leading to appeal are as under:-

1. That, the instant appeal is being filed vide Govt of KPK Civil Servant Rule " Right to Appeal" U/S-03-1 of 1986 and if it may not be decided within the specified period then appellant reserves her fundamental right to challenge the illegal Promotion Orders U/S -4 of NWFP now KPK Service Tribunal Act 1974 before proper Forum. The impugned promotion orders are illegal and Malafide of Respondents, which are liable to be set-aside inter-alia on the following facts and grounds:-
  - i) That, appellant was appointed as a "Qaria" in BPS-09, at GGHS Samundar Khatha, District Abbottabad on 19/04/1999.
  - ii) That, the appellant passed her B.A Examination from University of Peshawar in 2<sup>nd</sup> Division in the year 1999 and passed M.A (Islamyat) from University of Peshawar in the year 2003, as it is appellant passed B.Ed from AIOU Islamabad in the year 2004.
  - iii) That, appellant was promoted from BPS-09 to BPS-12 on 01/07/2012 in compliance of Notification dated 11/07/2012, issued by Elementary & Secondary Education Department KPK, Peshawar.
  - iv) That, on 20/12/2013, Govt of Khyber Pakhtoonkhwa, issued a notification according to which 75 % teachers (CT/SCT, DM/SDM, AT/S.T, TT/STT; Qaria/S.Qaria) were to be promoted to SST post and 3% quota was also fixed for the promotion of Qaria / S.Qaria to SST post in the said 75% Promotion Quota.
  - v) That, in the impugned orders, following most junior Qaria and S.Qarias teachers has been promoted to SST posts but the appellant was badly ignored:-

ATTESTED

Shayza Jalil



- (1) Mst. Attia Nishan Abbasi promoted to SST post vide order Endst: No.2527-30 dated 11/05/2016, issued by Director E&S Education KPK, Peshawar.
- (2) Mst. Nasreen Bibi promoted to SST post vide order Endst: No.5694-5700 dated 22/12/2017, issued by Director E&S Education KPK, Peshawar.
- (3) Mst. Uzma Rasheed promoted to SST post vide order Endst: No.4118-23 dated 02/03/2020, issued by Director E&S Education KPK, Peshawar.
- vi) That, the meanwhile, appellant promoted from Qaria to S/Qaria post on 08/02/2018 vide Endst: No. 1033-37 issued by DEO (F) Abbottabad and at the present appellant working as a S/Qaria at GGHSS, Dhamtour, Tehsil & District, Abbottabad in BPS-15.
- vii) That, the seniority of any employee is to be considered from the date of first appointment of the employee according to the Rules, Law, Policy and Judgment of the August Supreme Court of Pakistan.

*In view of the above facts, grounds and Law, It is very, humbly prayed that on acceptance of instant Departmental appeal, Appellant may kindly be promoted to SST (Gen) post with all back benefits. on the basis of seniority w.e.f. the date, at which the most junior teacher, from the appellant, was promoted.*

*Shazia Jalil*

SHAZIA JALIL (S/QARIA)  
GGHSS, DHAMTOUR,  
Tehsil &, District, Abbottabad  
Dated: 11/09/2020.

Copy for information:-

1. DEO (Female) District, Abbottabad.
2. Principal GGHSS, Dhamtour, District, Abbottabad.

**ATTESTED**  
*Shazia Jalil*

کورٹ فیس

# وکالت نامہ

BEFORE THE R.P.K Service Tribunal - بعدالت

Mst Shazia Talib نام Court R.P.K عنوان:

Appellant منجانب:

Service Tribunal نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

Hamayun Khan & Fazlullah Khan

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پر داخنتہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت نالش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

المقوم:

بمقام: Add.

Accepted by

H. Talib