

10.02.2021

Junior to counsel for appellant present.

Noor Zaman Khattak learned District Attorney present.

None present on behalf of respondents despite strict directions to furnish the record. As such, the respondents be put on notice with last chance to produce entire record failing which, strict action will be taken against all. To come up for production of relevant record and preliminary hearing on 01.06.2021 before S.B.



(Rozina Rehman)
Member (J)

01.06.2021

Counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG alongwith Bahramand ADO for the respondents present.

Representative of the respondents produced copy of order dated 01.12.2020, whereby the appellant has been promoted as Senior C.T (BPS-16). Keeping in view the said development, learned counsel for the appellant requests for withdrawal of instant appeal. His signature has been obtained in the margin of order sheet as evidence of said request. The appeal is dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED
01.06.2021



Chairman

3 withdrawal
Appeal kept in
New order dated 1/12/20
1/6/2021

08.09.2020

Counsel for the appellant present.

Requests for adjournment in order to further prepare the brief. Adjourned to 21.09.2020 for hearing before S.B.


Chairman

21.09.2020

Counsel for the appellant present.

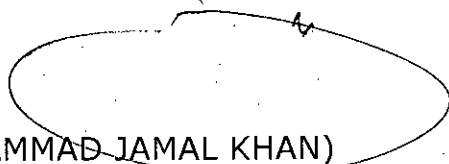
Notices be issued to respondents for production of record relevant to the instant appeal on 24.11.2020 before S.B.


Chairman

24.11.2020

Learned counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

Record on behalf of respondents not submitted. Learned Additional Advocate General is directed to contact the respondents and furnish the record on the next date of hearing. Adjourned to 10.02.2021 on which date file to come up for record before S.B.

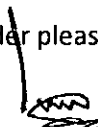




(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1189 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/02/2020	<p>The appeal of Mst. Mansoor Begum presented today by Mr. Fazal Shah Mohmand Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p> REGISTRAR 25/2/2020</p>
2-	02/03/20	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>10/04/2020</u>.</p> <p> MEMBER</p>
10.04.2020		<p>Due to public holiday on account of COVID-19, the case is adjourned to 07.07.2020 for the same. To come up for the same as before S.B.</p> <p> Reader</p>
	07.07.2020	<p>Learned counsel for the appellant present and requested for adjournment. Adjourned. To come up for preliminary hearing on 08.09.2020 before S.B</p> <p> Member (J)</p>

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No 1189 /2020

Manzoor Begum.....Appellant

V E R S U S

DEO and Others.....Respondents

I N D E X

S.No	Description of documents	Annexure	Pages
1.	Service Appeal with affidavit		1-5
2.	Application for interim relief with affidavit		6-7
3.	Copy of Appointment Order	A	8
4.	Copy of Appointment Order dated 19-04-2013	B	9-12
5.	Copy of Seniority List of SCTs and CTs 2017	C	13-14
6.	Copy of Notification dated 31-05-2018	D	15-16
7.	Copy of proposed list	E	17-18/1
8.	Copy of Appeal	F	19
9.	Wakalat Nama		20

Dated: 21-02-2020

Manzoor Bibi
Appellant

Through


Fazal Shah Mohmand

Advocate Peshawar.

OFFICE:- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841

Email:- fazalshahmohmand@gmail.com

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No 1189 /2020

Khyber Pakhtunkhwa
Service Tribunal

Entry No. 1331

Dated 25/2/2020

Manzoor Begum, Certified Teacher (BPS-15) Govt. Girls Middle School
Amankot Merged District Bajaur.

.....Appellant

V E R S U S

1. District Education Officer Merged District Bajaur.
2. Director Education Merged Districts, Merged Area Secretariat, Peshawar.
3. Director, Elementary and Secondary Education, Govt. of Khyber Pakhtunkhwa Peshawar.
4. Secretary, Elementary and Secondary Education, Govt. of Khyber Pakhtunkhwa Peshawar.

.....Respondents

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE INACTION OF RESPONDENTS OF NOT PROMOTING THE APPELLANT AS SENIOR CERTIFIED TEACHER (BPS-16) FOR WHICH DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED SO FAR DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINETY DAYS.

Filed to-day
Magistrate
25/2/2020

PRAYER:-

On acceptance of this appeal the respondents may kindly be directed to promote the appellant as Senior Certified Teacher (BPS-16) with effect from 11-11-2019 with consequential service benefits.

Respectfully Submitted:-

1. That the appellant is highly qualified, having passed her Master Degree besides Bachelor of Education and Master of Education.

2. That appellant was initially appointed as PTC on 12-04-2007 who performed her duties and continued her service till the posts of Certified Teachers were advertised by the respondents and appellant being perfectly fit and eligible and coming up to the criteria also applied for the same through proper channel. **(Copy of Appointment Order is enclosed as Annexure A).**
3. That the appellant after due process was called for interview and finally upon the approval and recommendations of Departmental Selection Committee was appointed as Certified Teachers (BPS-15) herein after referred to as CT vide Appointment Order dated 19-04-2013 in Tehsil wise merit and all the appellant accordingly took the charge of the post. **(Copy of Appointment Order dated 19-04-2013 is enclosed as Annexure B).**
4. That the name of the appellant was also placed in the General Seniority List of Females Senior Certified Teachers and Certified Teachers as evident from the Seniority List of the year 2017 maintained of SCTs and CTs of Merged District Bajaur. **(Copy of Seniority List of SCTs and CTs 2017 is enclosed as Annexure C).**
5. That accordingly promotions from time to time were made from the Seniority List maintained by the respondents, and in the year 2018 eight Female Certified Teachers (BPS-15) were promoted as Senior Certified Teachers (BPS-16) from the said Seniority List vide Notification dated 31-05-2018. **(Copy of Notification dated 31-05-2018 is enclosed as Annexure D).**
6. That in the year 2019 there were thirteen posts for promotion as Senior Certified Teachers (BPS-16), appellant being perfectly fit, Senior and eligible and coming up to the criteria was eligible and hopeful for promotion as Senior Certified Teacher (BPS-16) and accordingly respondent No 1 displayed proposed list of teachers of various cadres including the appellant for her promotion as Senior Certified Teachers (BPS-16) in the first week of November 2019 wherein it was mentioned that the

Departmental Promotion Committee meeting will be held on 11-11-2019. **(Copy of proposed list is enclosed as Annexure E).**

7. That appellant was thus hopeful of her promotion however for reasons best known to respondent No 1, the displayed list was changed and the names of the appellant was removed from the list, which list was even not displayed, where upon the appellant filed Civil suit in the Court of Civil Judge-III Bajaur and respondents were restrained from making illegal promotions, however finally the plaint of the appellant was rejected under Order-7 Rule-11 CPC vide Order dated 03-12-2019.
8. That in the meanwhile appellant filed departmental appeal against not including her name in the Departmental Promotion Committee meeting going to be held for making promotions of the CTs. to SCTs. and also requested for including her name for consideration for promotion as Senior Certified Teacher (BPS-16) in the forthcoming meeting of Departmental Promotion Committee but of no fruit till date despite the lapse of statutory period of ninety days. The appellant along with two others also approached the Peshawar High Court Peshawar by filing Writ Petition No 7355/2019 which was dismissed for want of jurisdiction. **(Copy of Departmental Appeal is enclosed as Annexure F).**
9. That this action of the respondents of not promoting the appellant as Senior Certified Teacher (BPS-16) from due date, is against the law, facts and principles of justice on grounds inter-alia as follows:

GROUND:

- A. That the omission and commissions of the respondents are illegal, unconstitutional, and unlawful, without lawful authority and of no legal effect, therefore need the interference of this honorable Tribunal.

- B.** That the appellant is senior, perfectly fit and eligible and coming up to the criteria have got every right to be promoted as Senior Certified Teacher (BPS-16) from due date i,e 11-11-2019.
- C.** That seniority cum fitness is the sole criteria for promotion according to which criteria and formula the appellant as per the Seniority List is entitled for promotion as Senior Certified Teacher (BPS-16) from due date.
- D.** That respondents for making promotion to 13 vacant posts of Senior Certified Teachers (BPS-16) first displayed the proposed list for Departmental Promotion Committee, wherein the appellant was placed at her relevant positions and as per her seniority while on the following day changed the list for no legal reason.
- E.** That in the year 2018 and even before, promotions have been made from the seniority list while respondents for reasons other than fair and bonafide are not ready to act as per law and rules.
- F.** That thirteen posts of Senior Certified Teacher (BPS-16) are lying vacant and appellant being perfectly fit, senior and eligible has got every right to be promoted against the post of Senior Certified Teacher (BPS-16).
- G.** That the appellant is discriminated and treated unequally in violation of the constitution of the land as even in past promotions were made accordingly while in case of the appellant respondents are not ready to shoulder their responsibility.

H. That the fundamental rights of the appellant guaranteed in the Constitution are badly violated and she is not treated as per law and rules governing the matter.

I. That the appellant seeks the permission of this honorable Court for further/additional grounds at the time of arguments.

It is therefore prayed that Appeal, of the appellant may kindly be accepted, as prayed for.

Any other relief not specifically asked for and deemed appropriate in the circumstances of the case, may also be granted in favor of the appellant.

Manzoor Bibi
Appellant

Dated:-21-02-2020

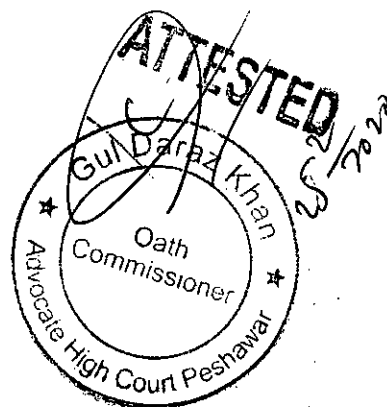
Through
Fazal Shah Mohmand
Fazal Shah Mohmand

Advocate Supreme Court.

A F F I D A V I T

I, Manzoor Begum, Certified Teacher (BPS-15) Govt. Girls Middle School Amankot Merged District Bajaur, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Manzoor Bibi
DEPONENT



BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No. _____/2020

Manzoor Begum.....Appellant

VERSUS

DEO and Others.....Respondents

APPLICATION FOR RESTRAINING RESPONDENTS FROM
MAKING PROMOTIONS IN VIOLATION OF THE SENIORITY
LIST OF 2017 TILL THE FINAL DISPOSAL OF INSTANT
APPEAL.

Respectfully submitted:-

1. That the accompanying appeal is being filed today in which no date of hearing has been fixed so far.
2. That the applicant/appellant is the senior as evident from the previous Seniority List but malafidely she is not promoted and respondents are going to make promotions in violation of the Seniority List.
3. That the applicant has got a good prima facie case and is sanguine of its success.
4. That the balance of convenience lies in her favor and if the respondents are not restrained from make promotions, the applicant would suffer irreparable loss.

It is therefore prayed that on acceptance of this application, the respondents may kindly be restrained from making promotions in violation of the Seniority List of 2017, till the final disposal of instant appeal.

Dated: 21-02-2020

Manzoor Bibi
Appellant.

Through
[Signature]
Fazal Shah Mohmand

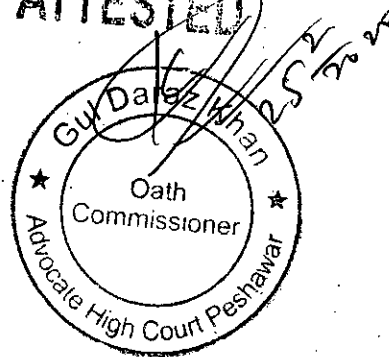
Advocate Supreme Court.

AFFIDAVIT

I, Manzoor Begum, Certified Teacher (BPS-15) Govt. Girls Middle School Amankot Merged District Bajaur, do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

Manzoor Bibi
DEPONENT

ATTESTED





OFFICE OF THE AGENCY EDUCATION OFFICER
BAJAUR AGENCY AT KHAR

APPOINTMENT ORDER:

Consequent upon the approval by the Departmental Selection Committee, the following Female candidates of sub-division Nawangal Bajaur Agency are hereby appointed Against PTC Posts purely on temporary basis in BPS-7 plus usual allowances as admissible under the rules/new policy notified by the Govt. of N.W.F.P vide SO (R-VI) E & AD/13-1/2005 dated 10/8/2005 and civil servants amendments act-2005 vide No. PA/N.W.F.P/Legis-1,2005-20440 dated 23/7/2005 with effect from the date of taking over charge in the schools noted against their names in the list of public service.

S.No	Name of Candidate	Father Name	Name of School where appointed	Remarks
1	Rahana Yasmin	Zar Mula Khan	GGPS Mianz Kamangara	Against newly created post
2	Nascha Begum (PTC) FCS Kamangara	Aziz Shah	GGPS Mianz Kamangara	Against newly created post
3	Ulfa Begum	Tamash Gul	GGPS Kikot	Against newly created post
4	Khalida Begum (PTC) FCS Seri Sar	Shahidullah	GGPS No. 2	Vice Sarwat Jehan Transferred
5	Nazro	Said Jan	GGPS Zangi	Against Vacant Post
6	Razia Sultan (PTC) FCS Landai	Fateh Rahim	GGPS Ghulja Kamangara	Against newly created post
7	Marzoor	Dahadur Shah	GGPS Amankot Barang	Against newly created post
8	Shazin Bibi	Zar Amin Khan	GGPS Zangi	Vacant post
9	Gul Shan	Muhammad Jan	GGPS Amankot	Against newly created post
10	Fatima (PTC) FCS Kharkana No 2	Qadir Muhammad	GGPS Ghulja Kamangara	Against newly created post
11	Hidayat Bibi (PTC) FCS Zangal Khel	Rahman Ghani	GGPS Mian Killi Kharkai	Against Vacant Post
12	Waliat Bibi (PTC) FCS Mattak	Ghani Rahuman	GGPS Mian Killi Kharkai	Vice Rukhsana Hukh PTC transferred
13	Halina Ismail PTC FCS Landai	Muhammad Ismail	GGPS Barkhatozo	Vice Hamida Ismail promoted to CT
14	Nahced Begum	Huzrat Wali	GGPS Shinkotai	Vice Nihayni Bibi promoted to CT
15	Anjum Shaheen	Ajab Khan	GGPS Kikot	Against newly created post
16	Musami	Habibullah	GGPS Inankhara Chingai	Vice Shabina PTC transferred
17	Sabila	Muhammad Amin	GGPS Inankhara Chingai	Against vacant post

TERMS AND CONDITIONS:

- The appointment of the candidates is being made purely on temporary basis & is liable to termination at any time without assigning any reason.
- They will not be entitled to get pension/gratuity benefits, however GP Fund & CP Fund will be deducted as per rules in case of fresh candidates.
- Charge report should be submitted to all concerned in duplicate.
- All kinds of documents should be verified from the concerned institution before the drawl of their salaries.
- Health and Age certificate should be produced to this office to be obtained from the Agency surgeon concerned.
- They should not be handed over charge of the posts if they are below 18 years or above 40 years in case of fresh candidates except those candidates to whom Age Relaxation has been granted by the competent authority.
- The trained candidates possessing higher qualifications of F.A. or B.A should be placed in BPS -9 if they have not already been availed the facility of advance increments on these qualifications.
- If they failed to report of their arrival within 15 days, their appointment order will be automatically considered as cancelled.

(Haji Gul Rehman)
Agency Education Officer
Bajaur Agency

Encl: No 2665-70 Dated 12/11/07

- Copy of the above is forwarded to the:
- Director of Education FATA N.W.F.P Peshawar
 - Agency Accounts Officer Bajaur Agency
 - AAEO Female Concerned
 - Head Teacher concerned
 - Official Concerned
 - Accountant of the local Office

Agency Education Officer
Bajaur Agency

10/11/07

OFFICE OF THE AGENCY EDUCATION OFFICER
BAJAUR AGENCY AT KHARAPPOINTMENT ORDER

Consequent upon the approval by the Departmental Selection Committee the following female candidates of Bajaur Agency are hereby appointed / adjusted against vacant CT Posts purely on temporary basis of BPS No. 09 (6200-380-17600) plus usual allowances as admissible under the rules / new policy notified by the Govt of Khyber Pakhtunkhwa vide SO (R-VI) E A1D/13-1/2005, dated 10/8/2005 and civil servants amendments at 2005 vide No. PA/NWEP/Legis-1,2005-20-1-10, dated 23/7/2005 w.e.f 19/04/2013 in the schools noted against their names in the interest of public service.

S. No.	Name of candidate	Father Name	Name of School where appointed	Remarks
1.	Musarat Shaheen	Said Zarin	GGMS Zarif Abad	Against newly created vacant post (open merit)
2.	Roshan Bibi	Jehangir Khan	GGMS Derago	Against newly created vacant post (Tehsil wise merit)
3.	Maryam Feroz	Feroz Khan	GGMS Derago	Against newly created vacant post (Tehsil wise merit)
4.	Saima	Noor Gul	GGMS Zarif Abad	Against newly created vacant post (Tehsil Wise merit)
5.	Noorin Bibi	Jehangir Khan	GGMS Kamal Dara	Against newly created vacant post (Open merit)
6.	Mehnaz Munir	Bakht Munir	GGMS Bandagai	Against newly created vacant post (Tehsil wise merit)
7.	Subhania	Ghulam Muhammad	GGMS Kohi Salzarzai	Against newly created vacant post (Tehsil wise merit)
8.	Sana Akhtar	Akhtar Munir	GGMS Pashat	Against newly created vacant post (Tehsil wise merit)
9.	Kalsoom Begum	Mukamil Khan	GGMS Dag Qilla	Against newly created vacant post (open merit)
10.	Uzma Gul	Muhammad Yar Khan	GGMS Chinagai	Against newly created vacant post (Tehsil wise merit)
11.	Hasina Naz	Sher Zada	GGMS Kohi	Against newly created vacant post (tehsil wise merit)

12.	Farkhanda	Abdur Rashid	GGMS Nari Tangi	Against newly created vacant post (Tehsil wise merit)
13.	Zeenat Begum	Afzal Khan	GGMS Kamal Dara	Against newly created post to open merit)
14.	Safia Bibi	Jan Khan	GGMS Nari Tangi	Against newly created vacant post (Tehsil wise merit)
15.	Shabina Rabi	Muhib Ullah	GGMS Chinagai	Against newly created vacant post (Tehsil wise merit)
16.	Nadia	Saif ur Rehman	GGMS Dag Qilla	Against newly created vacant post (Tehsil wise merit)
17.	Halima Ismail	Muhammad Ismail	GGMS Lol KHarkai	Against newly created post (open merit)
18.	Riaza Begum	Bahadar Khan	GGMS Ghani Adas	Against newly created vacant post (Tehsil wise merit)
19.	Asia Bibi	Haji Malang Jan	GHS Raghagan	Against newly created post Tehsil wise
20.	Farah Naz	Khurshid Roshan	GGMS Inayat Killi	Against newly created vacant post (Tehsil wise
21.	Nahid Akhtar	Muhammad Shoib	GGMS Ghakhi	Against vacant post (Open merit)
22.	Riaz Bano	Ghulam Said Ullah	GGMS Ghani Adai	Against newly crated vacant post (Tehsil wise merit)
23.	Balqees Begum	Sher Zadi	GGMS Kharkano	Against newly crated vacant post (Tehsil wise merit)
24.	Shabnam	Muhammad Ibrahim	GGMS Kharkhano	Against newly crated vacant post (Tehsil wise merit)
25.	Zahoor Begum	Muhammad Shoaib	GGMS Agra	Against newly crated vacant post (Tehsil wise merit)
26.	Kausar Begum	Rafat Khan	GGMS Loikharkai	Against newly crated vacant post (Tehsil wise merit)
27.	Shahana Nasir	Nasir Khan	GGMS Agra	Against newly crated vacant post (Tehsil wise merit)
28.	Manzoor	Bahadar Shah	GGMS Amankot Barang	Against newly crated vacant post (Tehsil wise merit)
29.	Hadia Bibi	Shah Zaimai	GGMS civil Colony Nawagai	Against newly crated vacant post (open merit)


 10/10/1

30.	Samina Naz	Sher Bahadar	GGMS Amankot Barang	Against newly crated vacant post (Tehsil wise merit)
31.	Samra Begum	Sarfaraz Khan	GGHS Malkana Nawagai	Against newly crated vacant post (Tehsil wise merit)
32.	Fauzia	Bakht Munir	GGMS, Kotkai Channang	Against newly crated vacant post (Tehsil wise merit)
33.	Salma Begum	Shah Zad Gul	GGMS Kotkai Charmang	Against newly crated vacant post (Tehsil wise merit)

TERNSY CONDITIONS

1. The appointment of candidate is being made purely on temporary basis & is liable to termination at any time without assigning any reason.
2. She will not be entitled to get pension / gratuity benefits, however GP Fund and CP fund will be deducted as per rules.
3. Charge reports should be submitted to all concerned.
4. All kinds of documents should be verified from the concerned institutions before the drawl of her salary.
5. Health and Age certificate should be produced to this office to be obtained from the agency surgeon concerned.
6. Her age should be according to the Govt policy.
7. If she failed to report of her arrival with in 15 days her appointment order will be automatically considered as cancelled.

Sd/-
Khasita Rahman
Agency Education Officer
Bajaur Agency

Endst No. 4893-98 Estab Dated Khar the 19/4/2013.

Copy of the is forwarded to the: -

1. Director of Education (FATA) Peshawar
2. Agency Accounts officer Bajaur Agency.
3. AAEO (M/F) concerned.
4. Accountant / Pay Clerk of the local office.
5. Head Master concerned.
6. Candidates concerned.

Sd/-
Agency Education Officer
Bajaur Agency

Charge Report

In compliance with the Agency Education Officer Bajaur wide his office Order Endst.No.4893-98/Estab, Dated 19/04/2013 and Notification No. 1536-41 dated 9/10/2013 I Miss. Balqees Begum d/o Sher Zada took over the charge of my duty on 10 /10/2013-before noon against the post of C.T at GGMS Kharkano Barthras Shamoza Tehsil Salarzai Bajaur Agency.

Makki Yar P.S.T

M
Ruler
Jar
10-10-2013

Hand Over

Signature SMK

Name: Shakeeb Mughal

Took Over

Signature Beggs

Name: Balqees Begum

Copy of the above is forwarded to:

1. Director of Education FATA Peshawar
2. Political Agent Bajaur Agency
3. Addl:Political Agent Bajaur
4. Agency Education Officer with reference to his office order no referred to above
5. Agency Account officer Bajaur Agency

[Signature]

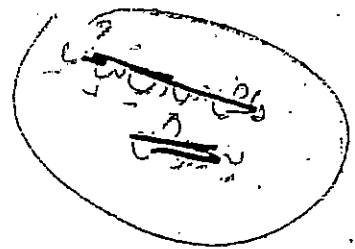
GENERAL SENIORITY LIST OF FEMALE SCT BS16 AND CT BS-15 IN DISTRICT BAJAUR.

S. No.	Name of Teacher	Academic Qualification	Grade	Present Post	Designation	BS/CT	Date of Birth	Dom. Dist.	Date of Entry into Govt. Service	Date of Appointment in the present post	Date of Promotion to Present Post	Remarks	
1	Amna Bibi	SSC	18B	Gul Zar Jambir	CT	15	4-Jan-74	Bajaur	2-Dec-97	2-Dec-97		GGMS Civil Colony Khar	
2	Salma Begum	BA	CT	Hambah Gul	SCT	16	1-Feb-59	Malakand	1-Sep-99	30-Nov-99	20-Feb-13	GGMS Bar Khatzo	Retired
3	Faiza	BA	CT	Sultan	SCT	16	4-Apr-78	Bajaur	25-Nov-04	25-Nov-04	20-Feb-13	GGMS Naray Tangay	Promoted to SST
4	Salma Syed	BA	Ind Course	Syed Mahmood	SCT	16	1-Apr-85	Mardan	25-Nov-04	25-Nov-04	20-Feb-13	GGMS Bandagal	
5	Amna Bibi	BA	CT	Bahadar Sald	SCT	16	4-Jan-77	Bajaur	1-Mar-00	1-Mar-06	20-Feb-13	GGMS Khar	Promoted to SST
6	Balhti Tanha	FA	CT	Akhtar Gul	CT	15	1-Feb-84	Bajaur	15-Mar-08	15-Mar-08		GGMS Khona	
7	Shamshad Khan	MA	CT+B.Ed	Umar Khan	SCT	16	7-Feb-60	Bajaur	13-Apr-07	13-Apr-07	20-Feb-13	GGMS Khar	Promoted to SST
8	Lat Bibi	BA	CT	Ajab Khan	SCT	16	3-Mar-81	Bajaur	13-Apr-07	13-Apr-07	20-Feb-13	GGMS Inayat Khar	Promoted to SST
9	Shauqia Khan	BA	CT+B.Ed	Balhti pur	SCT	16	1-Feb-82	Bajaur	13-Apr-07	13-Apr-07	20-Feb-13	GGMS Khar	
10	Hambah Ismail	BA	CT	Muhammad Ismail	SCT	16	1-Jun-82	Bajaur	13-Apr-07	13-Apr-07	20-Feb-13	GGMS Raghagan	
11	Mahyat Bibi	MA	CT+B.Ed+Med	Muhammad Wali	SCT	16	10-Apr-69	Bajaur	13-Apr-07	13-Apr-07	20-Feb-13	GGMS Shurbatal	
12	Habiba Bibi	MA/Med	CT+B.Ed	Gul Zada	SCT	16	8-Mar-86	Bajaur	25-Apr-07	25-Apr-07	31-May-18	GGMS Khar	
13	Nahid Begum	FA/BA	CT	Bacha Khan	SCT	16	14-Mar-80	Bajaur	1-Dec-99	29-Sep-08	31-May-18	GGMS Matako Goll Bugh	
14	Mumtazat Aiswan Zeb	MA	CT+B.Ed	Aurang Zeb	SCT	16	16-Apr-84	Bajaur	25-Nov-04	8-May-09	31-May-18	GGMS Bandagal	
15	Asmat Bibi	MA	CT+B.Ed	Ner Muhammad	SCT	16	2-Jun-83	Bajaur	50-Jul-03	4-Jun-09	31-May-18	GGMS Khona	
16	Nasreen Bibi	BA	CT+B.Ed	Said Karim Khan	SCT	16	16-Apr-78	Bajaur	29-Dec-05	5-Jun-09	31-May-18	GGMS Ghad Daba	
17	Sima Begum	MA	CT	Zanhold Ali	SCT	16	2-May-87	Bajaur	5-Jun-09	5-Jun-09	31-May-18	GGMS Khar	
18	Najat Bibi	FA	IHC	Semeen Khan	CT	15	10-Nov-88	Bajaur	23-Jun-09	23-Jun-09		GGMS Inayat Khar	
19	Rehana Yasmin	MA	CT+B.Ed	Zanmulla Khan	SCT	16	7-Feb-82	Bajaur	21-Aug-02	1-Oct-10	31-May-18	GGMS Khar	
20	Shahzeta Naz	BA	CT	Zar Mula Khan	SCT	16	8-Feb-82	Bajaur	16-Oct-10	16-Oct-10	31-May-18	GGMS Shah Naral	
21	Sultana	MA	CT+B.Ed	Ghulam Muhammad	CT	15	7-Jan-81	Bajaur	1-Jun-99	10-Oct-13		GGMS Sadq Abad	
22	Faiza	MA	CT+Med	Balhti Munir	CT	15	1-Nov-82	Bajaur	13-Apr-07	10-Oct-13		GGMS Shah Naral	
23	Rashan Bibi	MA	CT+Med	Jehangir Khan	CT	15	1-Jan-83	Bajaur	1-Aug-02	10-Oct-13		GGMS Dehngo Arang	
24	Balhti Begum	MA	CT+B.Ed+Med	Sher Zada Khan	CT	15	17-May-83	Bajaur	10-Oct-13	10-Oct-13		GGMS Khatkano	
25	Mohana Munir	MA	CT+B.Ed+M.Ed	Balhti Munir	CT	15	4-Feb-84	Bajaur	16-Apr-07	10-Oct-13		GGMS Bandagal	
26	Faizanda	MA	CT+B.Ed+M.Ed	Abdul Rashid	CT	15	20-Apr-84	Bajaur	1-Nov-03	10-Oct-13		GGMS Khatkano	
27	Kausar Begum	MA	CT+Bed	Rafat Khan	CT	15	1-Dec-84	Bajaur	10-Oct-13	10-Oct-13		GGMS Pashat	
28	Safia Bibi	MA	CT+B.Ed+M.Ed	Jan Khan	CT	15	19-Mar-85	Bajaur	25-Nov-04	10-Oct-13		GGMS Dag Qila	
29	Haleema Jmao	MA	PTC+CT	Muhammad Ismail	CT	15	21-Sep-85	Bajaur	1-Mar-06	10-Oct-13		GGMS Ghathal Marmund	
30	Ustina Gul	MA	CT+B.Ed+Med	Muhammad Yar Khan	CT	15	10-Jan-86	Bajaur	25-Nov-04	10-Oct-13		GGMS Amankot	
31	Ashraf Khan	MA	CT+B.Ed	Bahadar Shah	CT	15	9-Feb-86	Bajaur	13-Apr-07	10-Oct-13		GGMS Khatkano	
32	Farah Naz	BA	CT+Bed	Khushhal Roshan	CT	15	1-Jun-86	Bajaur	10-Oct-13	10-Oct-13		GGMS Khatkano	
33	Nadia	MA	CT	Saffur Rahman	CT	15	25-Feb-88	Bajaur	10-Oct-13	10-Oct-13		GGMS Raghagan	
34	Hadia Bibi	MA	CT+Med	Shah Zalmay	CT	15	3-Mar-88	Bajaur	1-Aug-09	10-Oct-13		GGMS C.C. Nawagal	
35	Maryam Feroz	MA	CT	Feroz Khan	CT	15	20-Apr-88	Bajaur	10-Oct-13	10-Oct-13		GGMS Dergo Arang	
36	Ruza Begum	BA	CT	Bahadar Khan	CT	15	12-Jul-88	Bajaur	10-Oct-13	10-Oct-13		GGMS C.C. Khar	
37	Shabeena Rohl	MA	CT+Bed	Muhtob Ullah	CT	15	1-Jan-91	Bajaur	10-Oct-13	10-Oct-13		GGMS Chingal UTK	
38	Salma Begum	MA	CT+Med	Shah Zaf Gul	CT	15	1-Jan-91	Bajaur	10-Oct-13	10-Oct-13		GGMS Chingal UTK	
39	Sana Akhter	BSc+MA	CT+Bed	Akhter Munk	CT	15	14-Aug-91	Bajaur	10-Oct-13	10-Oct-13		GGMS Chingal UTK	
40	Salma	MA	CT+B.Ed+Med	Noor Gul	CT	15	22-Jan-84	Bajaur	13-Apr-07	11-Oct-13		GGMS Zarif Abad	
41	Hassina Naz	MA	CT	Shah Zada	CT	15	17-May-84	Bajaur	12-Oct-13	12-Oct-13		GGMS Ghani Adal	
42	Saira Naz	MSc	CT	Nooran Shah	CT	15	1-Mar-92	Bajaur	25-Sep-17	25-Sep-17		GGMS Amankot	
43	Gulshan Naz	BA	CT	Ghulam Hussain	CT	15	3-Mar-87	Bajaur	26-Sep-17	26-Sep-17		GGMS Narai Tangi	
44	Tayeba	BA	CT	Rahmat Jan	CT	15	1-Feb-90	Bajaur	26-Sep-17	26-Sep-17		GGMS Agra Marmund	
45	Asfa Bibi	MA	CT	Muhammad Arif	CT	15	10-Mar-91	Bajaur	26-Sep-17	26-Sep-17		GGMS Lal Sam	
46	Nazfa Akbar	BA	CT	Jan Akbar	CT	15	11-May-72	Bajaur	7-Aug-94	12-Feb-18		GGMS Zagal	
47	Nobilar Begum	BA	CT	Ashraf Khan	CT	15	3-Mar-74	Bajaur	15-Mar-95	12-Feb-18		GGMS Lal Khatkano	
48	Zahida Bibi	BA	CT	Khon Dad Khan	CT	15	12-Jan-78	Bajaur	23-Sep-93	12-Feb-18		GGMS Karna Dera	
49	Yasmin Begum	BA	CT	Haji Umar Jan	CT	15	8-Oct-78	Bajaur	24-Jul-98	12-Feb-18		GGMS Ghani Adal	
50	Zuhra Naseem	MA	CT+Bed	Balhti Zada	CT	15	9-Apr-79	Bajaur	1-Sep-99	12-Feb-18		GGMS Minwar Arang	
51	Laila Mina	MA	CT+B.Ed+Med	Shah Zalmay	CT	15	20-Feb-82	Bajaur	1-Nov-00	12-Feb-18		GGMS Dag Qila	
52	Rozia Bibi	BA	CT	Janat Gul	CT	15	1-Mar-83	Bajaur	1-Sep-03	12-Feb-18		GGMS Raghagan	
53	Gul Pari	MA	CT+Bed	Umar Zamin	CT	15	8-Mar-83	Bajaur	1-Sep-03	12-Feb-18		GGMS Lal Khatkano	
54		MA	CT+Bed	Ghulam Nabil	CT	15	1-Apr-83	Bajaur	1-Sep-03	12-Feb-18		GGMS Ghathal Marmund	

2018/10/2

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-14-



the promotion of Female (CT) from BPS-15 to senior CT BPS-16.
 (duly verified from AAO Bajaur)
 or Female CT posts
 promotion 100%
 ad to BPS-16 Sr: CT
 available for promotion
 promotion to Sr: CT
 subject CT Female

73
 24
 24
 9
 15
 8

List of CT (Female) BS-15 working in Bajaur Agency for Promotion to Sr: CT BS-16

No	Seniority No.	Name of Teacher	Father's Name	BPS	Academic Qualif.	Profi Qualif.	Date of Birth	Date of Entry into Govt Service	Date of declaration as regular CT	Present School of posting	Whether eligible for upgradation	Remarks
1	27	Nagina Bibi	Gul Zada	15	MA	CT+B.Ed+M.Ed	8-Mar-86	25-Apr-07	25-Apr-07	GGHS Khar		
2	5	Naheed Begum	Bacha Khan	15	BA	CT	14-Mar-80	1-Dec-99	29-Sep-08	GGMS Goli Bagh Matako		
3	28	Mumilkat Aurang Zeb	Aurang Zeb	15	MA	CT+B.Ed	16-Apr-84	25-Nov-04	5-Jun-09	GGMS Zarif Abad		
4	29	Asmat Bibi	Nek Muhammad	15	MA	CT+B.Ed	2-Jun-83	1-Sep-03	4-Jun-09	GGHS Sharbatal		
5	30	Nasreen Bibi	Said Karim Khan	15	MA	CT+B.Ed+M.Ed	16-Apr-78	19-Dec-05	5-Jun-09	GGMS Ghazi Baba		
6	31	Seema Begam	Zarshad Ali	15	MA	CT+Bed	2-May-87	5-Jun-09	5-Jun-09	GGHS Khar		
7	33	Rehana Yasmin	Zarmulla Khan	15	MA	CT+B.Ed	7-Feb-82	21-Aug-02	1-Oct-10	GGHS Khar		
8	34	Shakeela Naz	Zar Mula Khan	15	BA	CT	16-Jan-91	16-Oct-10	16-Oct-10	GGMS Bar Khalozo		

Agency Education officer,
 Bajaur Agency



CT(F)

FATA SECRETARIAT
Directorate of Education
Warsak Road Peshawar, Pakistan.
Phone. 091-9210166 Fax 091-9210216

"D"

No. _____
dated ____/____/2018

-15-

Notification:

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt. of Pakistan Finance Division (Regulation Wing) Notification No.1(32)R-1/2015-582/2016 dated 25.7.2016 Islamabad, SO (Edu) Notification No.FS/SO(Edu)/SSD/Up-Gradation/2882-94 dated 22.6.2016 and duly Endorsed by Directorate of Education FATA vide No.8233-60 dated 8.8.2016, the following CT (F) B-15 are hereby promoted to the post of Sr. CT (F) B-16 (Rs.18910-1520-64510) plus usual allowances as admissible under the rules on regular basis on terms and conditions given below with immediate effect and further they will be posted in the Govt. Higher Secondary/High Schools by the Agency Education Officer concerned against the upgraded post.

Total No. of CT (F) Posts duly verified by the AAO	73
1/3 share of Senior CT Posts	24
Share of promotion 100%	24
Already promoted to B-16 SCT	21
No of Senior CT Posts available for promotion.	9
Recommended for promotion to Sr. CT	08

S#	Sen: No.	Name of Official	Place of Posting	DoB	Date of Regular Apptt. against CT Post	Remarks
1	27	Nagina Bibi	GGHS Khar	08/03/1986	25/4/2007	Services at the disposal Bajaur for further post
2	5	Naheed Begum	GGMS Goli Bagh Matako	14/3/1980	1/12/1999	Services at the disposal Bajaur for further post
3	28	Mumlatat Aurangzeb.	GGMS Zarif Abad	16/4/1984	25/11/2004	Services at the disposal Bajaur for further post
4	29	Asmat Bibi	GGHS Sharbatl	2/6/1983	1/9/2003	Services at the disposal Bajaur for further post
5	30	Nasreen Bibi	GGMS Ghazi Baba.	16/4/78	19/12/2005	Services at the disposal Bajaur for further post
6	31	Seema Begum	GGHS Khar.	2/5/1987	5/6/2009	Services at the disposal Bajaur for further post
7	33	Rehana Yasmeen	GGHS Khar	7/2/1982	21/8/2002	Services at the disposal

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FATA SECRETARIAT
DIRECTORATE OF EDUCATION

Warsak Road Peshawar, Pakistan
Phone 091-9210166 Fax 091-9210216

No. _____/

Dated ____/____/2018

Notification:

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt of Pakistan Finance Division (Regulation Wing) Notification No. 1(32)R-1/2015-582/2016 dated 25.7.2016 Islamabad, SO (Edu) Notification No. FS/SO(Edu)/SSD/Up-Gradation /2882-94 dated 8.8.2016, the following CT (F) B-15 are hereby promoted to the post of Sr. CT (F) B-16 (Rs. 18910-1520-65410) plus usual allowances as admissible under the rules on regular basis on terms and conditions given below with immediate effect and further they will be posted in the Govt Higher Secondary / High Schools by the Agency Education Officer concerned against the upgraded post.

Total No. of CT (F) duly verified by the AAO	73
1/3 share of Senior CT Posts	24
Share of Promotion 100%	24
Already promoted to B-16 SCT	21
No of Senior CT Posts available for promotion	9
Recommended for promotion to Sr. CT	08

S #	Sen: No.	Name of Official	Place of Posting	DoB	Date of Regular Apptt: against CT Post	Remarks
1.	27	Nagina Bibi	GGHS Khar	08.03.1986	25.04.2007	Services at the disposal Bajaur for further posting
2.	5	Naheed Begum	GGMS Goli Bagh Maako	14.03.1980	01.12.1999	Services at the disposal Bajaur for further posting
3.	28	Mumlakat Aurangzeb.	GGMS Zarif Abad	16.04.1984	25.11.2004	Services at the disposal Bajaur for further posting
4.	29	Asmat Bibi	GGHS Sharbati	02.06.1983	01.09.2003	Services at the disposal Bajaur for further posting
5.	30	Nasreen Bibi	GGMS Ghazi Baba	16.04.78	19.12.2005	Services at the disposal Bajaur for further posting
6.	31	Seema Begum	GGHS Khar.	02.05.1987	05.06.2009	Services at the disposal Bajaur for further posting
7.	33	Rehana Yasmeen	GGHS Khar	07.02.1982	21.08.2002	Services at the disposal Bajaur for further posting

[Signature]
10.11.2018

				Bajaur for further posting	
34	Shakeela Naz	GGMS Bar Khalozo	16/1/1991	16/10/2010.	Services at the disposal of AEO Bajaur for further posting

Terms & Conditions:

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

(Hashim Khan)
Director Education FATA

Endst: No. 8029-8091 /File No.1/Promotion Senior CT B-16 dated 31, 5 /2018

Copy for information and necessary action is forwarded to the:

1. Accountant General (PR) Sub Office, Peshawar.
2. Agency Education Officer, Bajaur Agency at Khar.
3. Agency Accounts Officer, Bajaur Agency.
4. PS to Additional Chief Secretary FATA.
5. PS to Secretary SSD, FATA.
6. PS to Secretary Finance.
7. PA Director Education, local Directorate.
8. Official Concerned.
9. Master File.

11
30/5/18
Add: Director (Estab)
Directorate of Education, FATA

17/1

"E"

(Proposed Lists) کی

فار (Various Categories) آف

بی (BS-16) کے

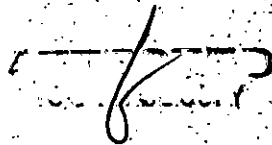
(Display) کے

11/11/19 کو منعقد ہونے والے DPC کے

- ① DM (M)
- ② IT (M)
- ③ AT (M/F)
- ④ CT (M/F)

DEO District

Bajour



PROPOSED LIST OF FEMALE CT BS-15 FOR PROMOTION OF SENIOR CT BS-16 WORKING IN DISTRICT BAJAUR

Senior ity No.	Name of Teacher	Father's Name	BPS	Acadmic Qualif:	Prof: Qualif:	Date of Birth	Date 1 st Entry into Govt: Service	Dte of declaration as regular CT	Present School of posting	Whether eligible for up gradation	Remarks
4	Subhania	Ghulam Muhammad	15	MA	CT+B.Ed	07-Jan-81	01-Jun-99	10-Oct-13	GGMS Sadiq Abad		
5	Fauzia	Bakht Munir	15	MA	CT+Med	01-Nov-82	13-Apr-07	10-Oct-13	GGMS Shah Narai		
6	Roshan Bibi	Jehangir Khan	15	MA	CT+MED	01-Jan-83	01-Aug-09	10-Oct-13	GGMS Dehrago Arang		
7	Balqees Begum	Sher Zada Khan	15	MA	CT+Bed+M. ed	17-May-83	10-Oct-13	10-Oct-13	GGMS KHarkano		
	Mehnaz Munir	Bakht Munir	15	MA	CT+B.Ed+ M.Ed	04-Feb-84	16-Apr-07	10-Oct-13	GGMS Bandagai		
	Farkhanda	Abdul Rashid	15	MA	CT+B.Ed+ M.Ed	20-Apr-84	01-Nov-03	10-Oct-13	GGMS Kharkano		
8	Kausar Begum	Rafat Khan	15	MA	CT+Bed	01-Dec-84	10-Oct-13	10-Oct-13	GGHS Pashat		
9	Safia Bibi	Jan Khan	15	MA	CT+B.Ed+ M.Ed	13-Mar-85	25-Nov-04	10-Oct-13	GGMS DAG Qilla		
	Haleema Ismail	Muhammad Ismail	15	MA	PTC+CT	21-Sep-85	01-Mar-06	10-Oct-13	GGMS Ghakhai Mamund		
	Uzma Gul	Muhammad Yar Khan	15	MA	CT+Bed+M. ed	10-Jan-86	25-Nov-04	10-Oct-13	GGMS.C.C Khar		
	Manzoor	Bahadar Shah	15	MA	CT+B.Ed	03-Feb-86	13-Apr-07	10-Oct-13	GGMS Amankot		
	Farah Naz	Khurshaid Roshan	15	BA	CT+Bed	1-Jun-86	10-Oct-13	10-Oct-13	GGMS Koni Salrzai		
	Nadia	Saifur Rahman	15	MA	CT	24-Feb-88	10-Oct-13	10-Oct-13	Raghagan		

DISTRICT EDUCATION OFFICER
BAJAUR

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفسر ضلع باجوڑ

درخواست برائے ہمدردانہ غور اپیل

عنوان :

جناب عالی!

مودبانہ گزارش کی جاتی ہے۔ کہ میں نے گورنمنٹ گرلز سکول امان کوٹ پرنمری سکول امان کوٹ میں بحیثیت PST پوسٹ پر 2007ء میں اپنی فرائض سرانجام دے چکی ہوں اور اکتوبر 2013ء میں میری تعیناتی سی۔ ٹی پوسٹ پر گورنمنٹ گرلز سکول امان کوٹ میں مستقل بنیاد پر ہو چکی ہے۔ دونوں پوسٹوں کی چارج رپورٹ درخواست کے ساتھ منسلک ہے۔ میری نام جو کہ پروپوز ڈسٹ کے سیریل نمبر 11 پر درج تھا اس سے ہٹا دی گئی ہے۔ میری نام D.P.C کے پروپوز ڈسٹ سے خارج کرنا میرے ساتھ نا انصافی اور ظلم پر مبنی ہے۔

لہذا آپ صاحبان کو ایک عاجزانہ اپیل کرتی ہوں۔ کہ آپ صاحبان مہربانی کر کے میری تمام کوائف کی درنگی فرمادیں۔ اور ڈی۔ پی۔ سی کے سناریوئی لسٹ میں شامل کرنے کے حکم صادر فرمائیں۔

تو عین نوازش ہوگی

عریفے

Mangoor Bibi
19/11/14
منظور بی بی
سی۔ ٹی۔ ٹیچر گورنمنٹ گرلز سکول امان کوٹ

DPC Committee

19/11

ATTACHED
TO ORIGINAL COPY

بعدالت لیسٹریٹو ٹریبیونل پشاور

لیسٹریٹو ایپل نمبر: 2020/1189

2020ء پنجاب منظور بیگم
منظور بیگم بنام DEO وغیرہ

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دکن کاروائی متعلقہ لیسٹریٹو ٹریبیونل پشاور کے لیے صاحب شہلا احمد + A.O.C کے نام سے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادری اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانش التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا ادکالت نامہ لکھ دیا کہ سند ہے۔

الرقوم 22 ماہ قوسی 2020

Attested
&
Accepted

کے لئے منظور ہے۔

Signature

بمقام لیشاور
Accepted
Signature
Adv