

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 3317/2020

Date of Institution ... 23.04.2020  
Date of Decision ... 02.02.2022

Nusrat Jehan W/O Abdul Mabood Khan R/O House No.219,  
Street No.10, Sector E-3, Phase-I, Hayatabad Peshawar.

... (Appellant)

**VERSUS**

The Government of Khyber Pakhtunkhwa through Secretary  
Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar  
and two others.

... (Respondents)

Bashir Khan Wazir,  
Advocate

... For appellant.

Muhammad Adeel Butt,  
Additional Advocate General

... For respondents.

Salah-Ud-Din  
Rozina Rehman

... Member (J)  
... Member (J)

**JUDGMENT**

ROZINA REHMAN, MEMBER (J): The appellant has invoked the  
jurisdiction of this Tribunal through above titled appeal with the  
prayer as copied below:

**"On acceptance of instant appeal, the impugned order  
dated 04.12.2019 may kindly be set aside and the  
respondents be directed to restore the appellant on  
his original position with all back benefits".**

2. Brief facts of the case are that appellant was initially appointed  
against the vacant post of CT (BS-09) vide order dated 23.11.1994.  
She submitted an application for her temporary transfer to Peshawar



and accordingly her transfer order was issued on 20.10.2012, whereby, her services were temporarily transferred to GGHS Bara Line Peshawar on need basis. In the meanwhile, she was promoted to the post of Senior CT (BS-16) and she was properly re-adjusted at GGHSS Lady Grift against the vacant post on 07.06.2013. She was then transferred to another school and then to GGHS Islamia Collegiate, Peshawar. It was on 04.12.2019 when an order in respect of recovery of overpayment was issued and being aggrieved from the said order, she filed departmental appeal which was not responded to, hence, the present service appeal.

3. We have heard Bashir Khan Wazir Advocate learned counsel for appellant and Muhammad Adeel Butt, learned Additional Advocate General for respondents and have gone through the record and the proceedings of the case in minute particulars.

4. Bashir Khan Wazir Advocate learned counsel appearing on behalf of appellant, inter-alia, argued that the act of the respondents is illegal, against law and facts because the appellant is performing her duty with full devotion and is entitled to the treatment which is being provided by law and rules. He contended that the appellant was rightly transferred temporarily and thereafter, she was rightly promoted to the post of BS-16 by the competent authority, therefore, the order in respect of recovery is illegal and it has been held by the superior fora that the benefits paid to an employee, could not be recovered and that the principle of estoppel would be applicable in the present case against the Department from the recovery of



overpayment/benefits of BS-16 from the appellant. Reliance was placed on Shamsur Rehmann Vs. Military Accountant General, Rawalpind and another reported in 2020 SCMR-188.


5. Conversely, learned AAG submitted that appellant was temporarily adjusted on need basis against CT post in GGHS Bara Line, Peshawar (BPS-15) with the direction that she will draw her salary from her original post at District Bannu. He contended that she was at the payroll of DEO (Female) Bannu and was promoted to the post of SCT on 21.02.2013. Later on, she was re-adjusted but she was continuously drawing her salary in BS-16 instead of BS-15. He argued that during the updating of seniority of CT and SCT, it was noticed that she had drawn her salary against the post of SCT (BS-16) instead of CT (BS-15), therefore, she was placed at her legal serial number of seniority on her turn in District Peshawar as per rules and overpayment made was directed to be recovered in installments.

6. Perusal of record would reveal that the appellant was initially appointed as Certified Teacher (BPS-9) vide order dated 23.11.1994 in district Bannu and was posted at GGHS Ghuri Wala Bannu. The post of CT was later on up-graded to BPS-15. While serving in district Bannu, the appellant requested the concerned authorities for her transfer to Peshawar due to her personal issues. Such request was accepted and the appellant was transferred vide order dated 20.10.2012 on temporary basis due to the reason that the post of CT was district cadre, hence she was posted temporarily against a vacant post of CT at GGHS Bara Line Peshawar on need basis subject to the condition that she will draw her salary from GGMS Bannu against her



original post till her proper adjustment against a vacant CT post. In the meanwhile, the appellant was promoted to the post of Senior Certified Teacher (BPS-16) vide order dated 21.02.2013. Since she was still on the strength of office of District Education Officer, Bannu, hence she actualized her promotion against the post of SCT at GGHS Kotka Bilawar Khan, Bannu and her pay was re-fixed in BPS-16 and entry to this effect were made in her service book on 25.03.2013. Consequent upon her promotion, the appellant was re-adjusted and transferred from GGHS Bara Line to GGHS Lady Griffith Peshawar against a vacant post vide order dated 07.06.2013. Her transfer order coupled with her salary statement would suggest that she was absorbed against a vacant post in Peshawar. The appellant was later on transferred from GGHS Lady Griffith to GGHS Islamia Collegiate Peshawar vide order dated 22.07.2016. The appellant was serving against the post until the impugned letter dated 04.12.2019, which was addressed by district education officer (female) to the principal GGHS Islamia Collegiate to recover over payment made to her as she was in BPS-15 but salary was drawn in BPS-16, against which the appellant filed departmental appeal, which was processed at some length but the appellant was not informed of its outcome.


7. Record would suggest that the appellant was properly promoted to BPS-16 vide order dated 21.02.2013 and while serving temporarily in district Peshawar, she had actualized her promotion in District Bannu in GGHS Kotka Bilawar Khan. The impugned letter dated 04.12.2019 is the result of confusion, as the appellant was temporarily posted in BPS-15 in Peshawar but she was actually on the strength of

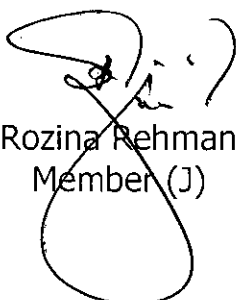


district Bannu until 07.06.2013. Upon promotion to BPS-16, she was permanently adjusted against a vacant post of BPS-16 in GGHS Lady Griffith and later on transferred to GGHS Islamia Collegiate Peshawar, hence she was correctly paid salary in BPS-16 and no overpayment is made to her. Even otherwise, the benefits once paid, could not be recovered and the principle of estoppel would be applicable in the present case against the department from recovering the emoluments and benefits from the appellant.

8. In this view of the matter, the instant appeal is accepted. The impugned order dated 04.12.2019 is set aside and the appellant is allowed to serve in BPS-16 from the date (21.02.2013), when she was promoted to BPS-16 alongwith consequential benefits, if any with direction to the respondents to correct their record accordingly and not to recover any amount from the appellant. Parties are left to bear their own costs. File be consigned to record room

ANNOUNCED.  
02.02.2022

  
(Salah-ud-Din)  
Member (J)

  
(Rozina Rehman)  
Member (J)

Order  
02.02.2022

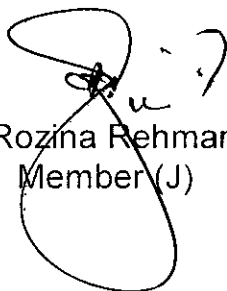
Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Vide our judgment of today of this Tribunal placed on file, the instant appeal is accepted. The impugned order dated 04.12.2019 is set aside and the appellant is allowed to serve in BPS-16 from the date (21.02.2013), when she was promoted to BPS-16 alongwith consequential benefits, if any with direction to the respondents to correct their record accordingly and not to recover any amount from the appellant. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED.  
02.02.2022

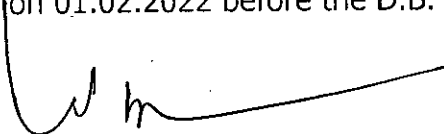
  
(Salah-Ud-Din)  
Member(J)

  
(Rozina Rehman)  
Member(J)

03.01.2022

Junior to counsel for the appellant and Noor Zaman,  
District Attorney for the respondents present.

Learned senior counsel for the appellant was stated  
to be busy before the Honourable High Court. Seeks  
adjournment. Request accorded. To come up for arguments  
on 01.02.2022 before the D.B.



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



Chairman

01.02.2022

Learned counsel for the appellant present. Mr. Noor  
Zaman Khan Khattak District Attorney for the respondents  
present.

Partial arguments heard. To come up for remaining  
arguments on 02.02.2022 before the D.B.




(Rozina Rehman)  
Member (J)

(Salah-Ud-Din)  
Member (J)

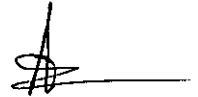
05.08.2021

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present.

After hearing arguments at certain length we made a query whether inter-district Transfer Policy is possible on the post reserved for promotion; if a government servant is transferred after having got promotion in his previous district can be adjusted on the post made for promotion. To come up for arguments on 10.09.2021 before D.B.



(Atiq Ur Rehman Wazir)  
Member (E)



Chairman

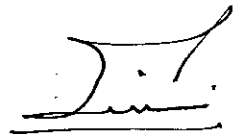
10.09.2021

Clerk of counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned To come up for arguments before the D.B. on 06.10.2021.



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

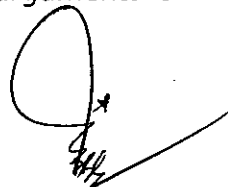


(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

06.10.2021

Counsel for the appellant and Mr. Javaidullah, Asstt. AG for the respondents present.

Counsel for the appellant seeks adjournment in order to further prepare the brief. Request is accorded. To come up for arguments on 03.01.2022 before the D.B.



(Mian Muhammad)  
Member(Executive)



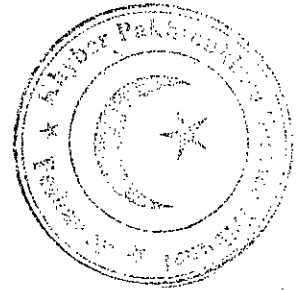
Chairman



21.08.2020

Due to public holiday on account of 1<sup>st</sup> Moharram, the case is adjourned to 26.10.2020 for the same as before.

Reader 



26.10.2020

Nemo for parties.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Notice be issued to parties for submission of written reply/comments for 10.12.2020 before S.B. In the meanwhile the operation of the impugned order dated 04.12.2019 to the extent of appellant is suspended.



(Rozina Rehman)  
Member (J)

10.12.2020

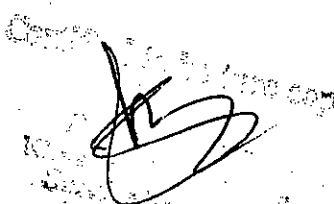
Counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Representative of respondents is not in attendance, therefore case is adjourned on the request of learned A.A.G with direction to submit reply/comments on 28.12.2020 before S.B. In the meanwhile the operation of impugned order dated 04.12.2019 to the extent of appellant shall remain suspended. till the next date fixed.



(Rozina Rehman)  
Member (J)



Handwritten notes and dates in the left margin:  
4/58/-  
5600  
21/12/2020  
21/12/2020  
21/12/2020

01.06.2020

None for the appellant present. Notices be issued to the appellant and his counsel. Adjourned. To come up for preliminary hearing on 06.08.2020 before S.B.

(Mian Muhammad)  
Member

06.08.2020

Mr. Bashir Khan, Advocate for appellant is present. Learned counsel for the appellant has sought withholding of recovery process initiated by the respondents on the basis of which they are bent upon making recovery from the appellant on the ground of having received over payment of BPS-16 instead of BPS-15 whereas infact appellant has been promoted from BPS-15 to BPS-16 therefore, the payment of salaries was made in accordance with law and rules applicable which has been prominently entered in the service book therefore, the order dated 04.12.2019 has been challenged.

The issues agitated at the bar require consideration and resolution in the light of law and rules in vogue therefore, the appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within ten days, thereafter, notices be issued to the respondents for written reply/comments. File to come up for written reply/comments on 21.08.2020 before S.B. In the meanwhile the operation of the impugned order dated 04.12.2019 to the extent of appellant is suspended.

(MUHAMMAD JAMAL KHAN)  
MEMBER

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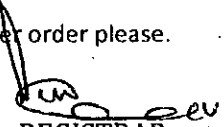
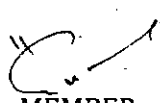

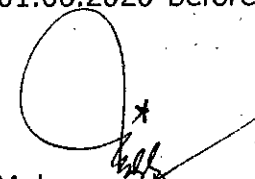
Secretary  
Federal Government

Form- A

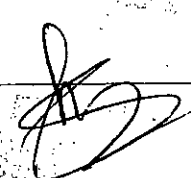
FORM OF ORDER SHEET

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

Case No. - 3317 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/04/2020	<p>The appeal of Nusrat Jehan submitted today i.e 23.04.2020 by Mr. Bashir Khan Wazir, Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p> REGISTRAR 23/4/2020</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up on <u>06-05-2020</u></p> <p> MEMBER</p>
	06.05.2020	<p>Nemo for the appellant. Adjourn. To come up for preliminary hearing on 13.05.2020 before S.B.</p> <p> Member</p>
	13.05.2020	<p>None for the appellant present. Adjourned. To come up for preliminary hearing on 01.06.2020 before S.B.</p> <p> (Mian Muhammad) Member</p>

APPROVED

  
Sd/-  
Registrar

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

Appeal No. 3317 /2020

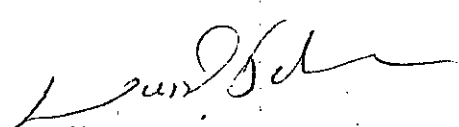
Nusrat Jehan..... Appellant

**V E R S U S**

Govt of KPK & others ..... Respondents


**I N D E X**

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-11
2.	Affidavit		12
3.	Application for suspension		13-14
4.	Affidavit		15
5.	Copy of the CNIC	A	16
6.	Copy of Appointment order	B	17-18
7.	Copy of the Order dated 20.10.2012	C	19-20
8.	Copy of Notification dated 21.02.2013	D	21-24
9.	Copy of the Office Order and Service Book	E	25-35
10.	Copy of the Transfer Order dated 22.07.2016	F	36-
11.	Copy of impugned Order	G	37.
12.	Copy of the Appeal and office order of the Respondents in respect of Departmental Appeal	H	38-41
13.	Wakalat Nama		42

  
Appellant

Through

Dated: 21.04.2020

  
**BASHIR KHAN WAZIR**  
Advocate, High Court  
Peshawar

D

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

Appeal No. 3317 /2020

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 2647

Dated 23-4-2020

Nusrat Jehan W/o Abdul Mabood Khan R/o House No  
219, street No 10, Sector E-3, Phase-I, Hayatabad  
Peshawar.

..... Appellant

**V E R S U S**

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

..... Respondents

Filed to-day  
Registrar  
23/4/2020

**APPEAL UNDER SECTION 4 OF THE**  
**KHYBER PAKHTUNKHWA SERVICE**  
**TRIBUNAL ACT, 1974, AGAINST THE**  
**IMPUGNED ORDER DATED 04.12.2019**  
**WHEREBY THE PRINCIPAL OF GGHSS**

2

ISLAMIA COLLEGIATE PESHAWAR HAS  
BEEN ORDERED TO MAKE RECOVERY OF  
OVERPAYMENT AMOUNT AGAINST THE  
APPELLANT, WHICH WAS ISSUED BY THE  
RESPONDENT NO 3, IN THIS RESPECT  
THE APPELLANT HAS BEEN FILED AN  
DEPARTMENTAL APPEAL TO THE  
RESPONDENTS BUT UPTIL NOW THE  
RESPONDENTS NEITHER RESPONDED  
NOR DECIDED THE SAME AFTER  
COMPLETION OF MANDATORY PERIOD.

**Prayer in Appeal:**

On acceptance of the instant Appeal, the impugned order dated 04.12.2019 may kindly be set aside and the Respondents be directed to restore the Appellant on his Original position with all back benefits and with mutatis mutandi.

Respectfully Sheweth:

The Appellant humbly submits as under:-

1. That the Appellant is peaceful and law abiding citizen of Pakistan and is entitled for all the rights guaranteed by the Constitution of Islamic Republic

of Pakistan, 1973. **(Copy of the CNIC is attached as Annex "A")**

2. That the Appellant was initially appointed against the vacant post of CT in BPS-09 vide office order No 16740-44/AE-I/CT dated 23.11.1994 in the Respondents Department, after his appointment he had joined the said post and assumed the charge. **(Copy of Appointment order is attached as annexure B)**
  
3. That after the initial appointment the Appellant was performing her duty on the subject post, since her appointment meanwhile the Respondents prepared the Seniority List vide which she Appellant was eligible for promotion and lastly her name was recommended for the promotion on the post of Senior CT BPS-16, during the pendency of promotion the Appellant submitted an Application to the Respondents for her temporary transfer to Peshawar as she was deserted from the house of her husband she had come to the house of her parents situated at Peshawar, the Respondents as being the competent authority while issued transfer order in favour of the Appellant on dated 20.10.2012, whereby her services had been temporarily transferred to the School of GGHS Bara Line Peshawar on need basis, in which the note has

4)

been given in Para 1<sup>st</sup> of the note the condition has been mentioned that she will draw her salary from GGCMS Bannu till her proper adjustment against vacant City. **(Copy of the Order dated 20.10.2012 is attached as annexure C)**

4. That after the temporary transfer of the Appellant she had joined the duty in the School GGHS Bara Line and she was performing her duty, meanwhile the Directorate of Elementary and Secondary Education, while issuing the notification on dated 21.02.2013, the Appellant was promoted on the post of Senior CT BPS-16, whereby the name of the Appellant has been mentioned at Serial No 34. **(Copy of Notification dated 21.02.2013 is attached as annexure D)**

5. That after issuance of above mentioned promotion order which was duly issued after the recommendation of the Departmental Promotion Committee, the Appellant had also been promoted to BPS-16, thereafter the Respondent No 4 has properly issued another office order vide which the Appellant has been properly re-adjusted at GGHSS Lady Grift Peshawar against the vacant post on dated 07.06.2013, on the basis of this office order the services of the Appellant has properly adjusted on the basis of regular and vacant post accordingly entries had been made in



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the service book of the Appellant. **(Copy of the Office Order and Service Book are attached as annexure E)**

6. That after about 4 ½ years the Appellant time and again has been transferred from one School to another and lastly vide office order No 4711-16 dated 22.07.2016 the Appellant has properly been transferred from the GGHSS Lady Grift Peshawar to GGHS Islamia Collegiate Peshawar against vacant post, the Appellant accordingly assumed the charge of the said post. **(Copy of the Transfer Order dated 22.07.2016 is attached as annexure F)**

7. That as per the above mentioned record it could easily be gathered that the Appellant was initially appointed at District Bannu but after proper approval and recommendation of the competent authority she had initially been transferred on the basis of temporary / attachment and thereafter when she had promoted on the post of Senior CT BPS-16 thereafter she had been permanently readjusted on regular basis on the vacant post and after more than 4 years the Respondents has astonishingly issued the impugned order No 5160-62 dated 04.12.2019 on the subject recovery of overpayment amount from the present Appellant due to the reason that she had

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incorrectly been mentioned as promoted to BPS-16 and it has also been mentioned that unfortunately wrong entry of SCT-16 made in the service book of the Appellant instead of CT BPS-15 due to which she paid salary of BPS-16 instead of BPS-15. **(Copy of impugned Order is attached as annexure G)**

8. That when the Appellant received the above mentioned impugned order in respect of recovery she had submitted appeal before the competent authority in which the detail of promotion and transfer of the Appellant has been reproduced, however the Respondents neither responded on the Appeal of Appellant nor the impugned order has been set aside. **(Copy of the Appeal and office order of the Respondents in respect of Departmental Appeal are attached as annexure H)**

9. That the Appellant is serving in the Respondents department since 1994 and time to time promoted on higher pay scale as per the rules and lastly she had been promoted by the competent authority after proper given proper recommendation by the Departmental Promotion Committee, the Appellant feeling aggrieved from the acts and conducts of Respondents now approaches this Hon'ble Tribunal on the following grounds inter alia:-

**GROUND S:**

A. That the Appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.

B. That the acts of the Respondents of not following the relevant rules, regulations and well known the facts of regarding the Appellant being performed her duty with full devotion is entitled of the treatment which are provided by law and rules, as guaranteed by the fundamental rights, however the Respondents are having been refused to treat the Appellant as per rules and criteria, is illegal, unlawful, unnatural, ab-initio, null and void in the eye of law, hence liable to be declared so.

C. That it is well settled law and principal of promotion has been prescribed on the manner that whenever there is a malafide or leading in violation of constitutional guaranteed the constitutional courts have ample power to interfere for redressal of law in any case has to be geared properly and injustice in the form of supersession has to be curbed, so that people must sense of deprivation or discomfort otherwise there has to be a chaos in the society and people

(2)

lose confidence in all institutions of modern constitutions; the constitution of Pakistan emphasizes upon fundamental rights and such rights in any case have the courts as guardians of citizens, provision of Art 199 of the Constitution empowers the court to exercise jurisdiction in to being ignored, in any case merit cum seniority has to be recognized, but in the instant case once the rights of promotion has been given to the Appellant and she had accrued the right of promotion and she has performed her duty on the said post for a long 4 ½ years the subsequent acts of the Respondents as issued the above mentioned impugned order is amount to violation of the principle of the locus poentientiae and is liable to be struck down in the eyes of law.

D. That as per the above mentioned record the Appellant has validly been transferred temporarily and thereafter promoted by the competent authority on the post of BPS-16, subsequently the Respondents had issued the above mentioned order in respect of recovery on the reason mentioned in impugned order is illegal, unlawful, void ab initio and covered by the locus poentientiae, the August courts had categorically delivered views in respect of recovery which was

declared illegal, unlawful and against the natural justice.

E. That in the case of Syed Mushtaq Ahmad Gillani Vs Chief Executive reported 2010 PLC CS 679, this Hon'ble Court has declared similar acts of the Government as against the law and principles of natural justice, no doubt the present Appellant is the Civil Servant but in the present case consequent upon the recommendation of the Selection Promotion Committee, in its meetings the competent authority approved the promotion of the Appellant and after promotion she was serving as such against the sanctioned post. As the Appellant was promoted on the basis of seniority cum fitness by the competent authority on regular basis and was holding the said sanctioned posts, such promotion order was neither the outcome of fraud nor misrepresentation on the part of the Appellant, which she enjoyed for more than 4 ½ years under the principle of natural justice as well as rules of locus poentioentie, the Appellant has got the right to invoke jurisdiction of this Hon'ble Tribunal.

F. That in the case of Asad Ali Alvi Vs Secretary Government of Punjab reported in 2007 PLC CS 924 similar acts of the Department was declared as illegal, similarly in the instant case the

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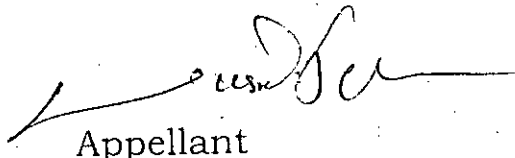
Appellant was awarded has been awarded promotion on the recommendation of Departmental Promotion Committee prior to the promotion the Appellant was transferred in the disposal of Respondent No 3 which was later on permanently adjusted, after proper orders of recovery of amount paid on basis of incorrect entry and received by the Appellant is illegal, unlawful, unwarranted and void ab initio in the eyes of law and the same may be set aside.

G. That it is well settled and established law, that whenever a right has been accrued to the employee on the basis of recommendation of the Departmental Selection Committee and later on it has been rescinded by the authority it would be ineffective upon the right of employee on the basis of that very principal the Apex Courts recently rendered a Judgment reported as 2020 SCMR 188, in which the similar position has been decided and the August Court has mentioned that whenever the employee has been promoted through departmental selection committee and he has received the benefits of the said promotion and subsequently the authority has reversed the said order with further order to be recovered the over payment which has been set aside in the above mentioned Judgment.

(11)

H. That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

It is, therefore, most humbly prayed that On acceptance of the instant Appeal, the impugned order dated 04.12.2019 may kindly be set aside and the Respondents be directed to place the Appellant on his Original position with all back benefits and with mutatis mutandi.



Appellant

Through

Dated: 21.04.2020



**BASHIR KHAN WAZIR**  
Advocate, High Court  
Peshawar

12

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

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

**Nusrat Jehan..... Appellant**

**V E R S U S**

**Govt of KPK & others ..... Respondents**

**AFFIDAVIT**

I, Nusrat Jehan W/o Abdul Mabood Khan R/o House No 219, street No 10, Sector E-3, Phase-I, Hayatabad Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.

  
**DEPONENT**



13

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

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

**Nusrat Jehan..... Appellant**

**V E R S U S**

**Govt of KPK & others ..... Respondents**

**APPLICATION FOR SUSPENSION OF THE  
OPERATION OF IMPUGNED ORDER DATED  
04.12.2019 ISSUED BY RESPONDENT NO  
3, TILL THE FINAL DECISION OF THE  
SERVICE APPEAL.**

**Respectfully Sheweth:**

1. That the above noted Service Appeal is being filed before this hon'ble court, in which no date of hearing has yet been fixed.
2. That the Appellant has got a good prima facie case in their favour, and are sanguine about its success.
3. That the balance of inconvenience also lies in favour of the Appellant.
4. That if the impugned Order dated 04.12.2019 is not suspended, the Appellant would sustain an

14

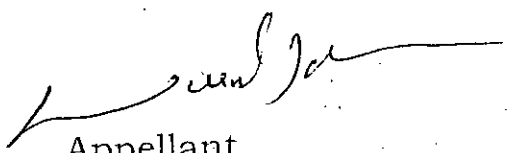
irreparable loss, and very purpose of the present Appeal will become frustrated.

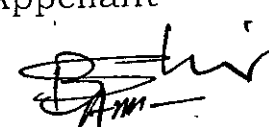
5. That the facts and grounds of the Service Appeal may kindly be read as an integral part of this application.

It is, therefore, respectfully prayed that on acceptance of this application, the Impugned order dated 04.12.2019 may kindly be suspended, till the final decision of the case.

Dated: 21.04.2020

Through

  
Appellant

  
**BASHIR KHAN WAZIR**  
Advocate, High Court  
Peshawar

15

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL PESHAWAR**

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

**Nusrat Jehan..... Appellant**

**V E R S U S**

**Govt of KPK & others ..... Respondents**

**AFFIDAVIT**

I, Nusrat Jehan W/o Abdul Mabood Khan. R/o House No 219, street No 10, Sector E-3, Phase-I, Hayatabad Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying Application are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.

  
**DEPONENT**

PAKISTAN National Identity Card  
ISLAMIC REPUBLIC OF PAKISTAN

Name: Nusrat Jehan


Husband's Name: Abdul Wahid Khan

Gender: Female Country of Stay: Pakistan

Identity Number: 11101-4752921-4 Date of Birth: 21.04.1966

Date of Issue: 23.01.2014 Date of Expiry: 23.01.2021

Holder's Signature



A  
16

11101-4752921-4

میرزا نسرین بیگم کے لیے شناختی کارڈ نمبر 219، مزیت  
میر 20، پگڑا ای-3، چنار

101601038083  
155-64-007668

Registrar General of Pakistan

کشف شدہ کارڈ نمبر پر قریبی لیڈیکس میں ڈال دیں

Atc  
PK

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17

OFFICE OF THE DIVISIONAL DIRECTOR OF EDUCATION (SCHOOLS) DIKHAJAN, DIVN: DIKHAJAN.  
APPOINTMENT.

Consequent upon the selection made in the interview held on 25-8-1994, the following CT, trained candidates comes on merit are hereby appointed against the vacant CT, posts in BPS-9, plus usual allowances in the schools noted against each in the interest of public service on the following terms and conditions, with effect from the date of their taking over charge.

S: NO.	Name of Candidates with Addresses.	Place of posting	Remarks
1 -	Miss Hina Naz D/O Munir Ahmad PTC GGPS-Cenntt; Bannu.	GGMS: Gulen Nurar V/Pot Bannu.	
2 -	Miss Nussrat Jahan D/O Mohammed Mumtaz Ali PTC, GGPS-No. 2. Bannu.	GGHS: Ghoriwala Bannu.	-do-

- NOTES:-
- 1- Charge reports should be submitted to all concerned.
  - 2- No, TA/DA etc is allowed.
  - 3- The appointments are purely on temporary basis and liable to termination at any time without any notice.
  - 4- The candidates are required to produce health and age certificates from the Medical Supdt: Concerned.
  - 5- The Head of the Institution are required to check the original Degree from the candidates concerned before handing over charge.
  - 6- If they fails to take over charge within 15-days after the issue of this order then it should stand cancelled.
  - 7- They will be on probation for the period of 2-year.

Sd/-  
( Abdul Wasi )  
Divl: Director of Education (S)  
DIKhan Divn: DIKhan.

Andst: No. 16740-44 / AN-I/CT. Dated DIKhan the 23/11 /94.

Copy to the :-

- 1- Distt: Education Officer (Female) Secy: Bannu.  
Headmistess concerned.

*Tamim Akhbar*  
By: Divl: Director of Eduz: (S)  
DIKhan Divn: DIKhan.

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BETTER COPY

**OFFICE OF THE DIVL DIRECTOR OF EDUCATION (SCHOOLS) DI KHAN**  
**DIVN: DI KHAN**

**APPOINTMENT.**

Consequent upon the selection made in the interview held on 23.08.1994, the following CT, trained candidates comes on merit are hereby appointed against the vacant CT, Posts in BPS-9, plus usual allowances in the schools noted against each in the interest of public service on the following terms and conditions, with effect from the date of their taking over charge.

S. No	Name of candidates with addresses	Place of posting	Remarks
1.	Miss Hina Naz D/o Munir Ahmad PTC GGPS-Cantt: Bannu	GGMS: Gulan Nurar Bannu	V/Post.
2.	Miss Nusrat Jehan D/o Mohammad Mumtaz Ali PTC, GGPS-No 2 Bannu	GGHS Ghoriwala Bannu	-do-

Notes:-

1. Charge reports should be submitted to all concerned.
2. No TA/DA etc is allowed.
3. The appointments the above named mistress are purely on temporary basis and liable to termination at any time without any notice.
4. The candidates are required to produce health and age certificates from this Medical Supdt: concerned.
5. The Head of the Institution are required to check the original Degree from the candidates concerned before handing over charge.
6. If they fails to take over charge within 15 days after the issue of this order than it should stand cancelled.
7. They will be on probation for the period of 2 years.

Sd/-

(Abdul Wasi)

Divl: Director of Education (S)  
DI Khan Divn: DI Khan

Endst No 16740-44/AE-I/CT.

Dated DI Khan the 23.11.94.

Copy to the:-

1. Distt: Education Officer(Female) Secy: Bannu
2. Headmistress concerned.

Divl: Director of Education (S)  
DI Khan Divn: DI Khan

Atc  
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(A)

19



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

ADJUSTMENT:

Consequent upon the placement of services at disposal of this office by the Director E & S Education Khyber Pakhtunkhwa Peshawar vide Office order issued under Endst. No. 111S3-89 dated 16/10/2012, Ms. Nusrat Jehan C.T.G. G.C.M.S. Bannu hereby temporarily adjusted at GGHS Bara Linc Peshawar on need basis

Note:-

1. She will draw her salary from GGMS Bannu till her proper adjustment against vacant C.T.
2. Charge report should be submitted to all concerned.
3. No P.A./D.A etc is allowed.

(SHARIF GUL)  
Executive District Officer  
Elementary & Secondary Education Peshawar

Endst. No. 4040-47 P.F. Nusrat Jehan C.T.

Dated 20/10 2012

Copy of the above is forwarded to the:

1. District Accounts Officer Peshawar.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Executive District Officer E & S Education Bannu.
4. PA to Executive District Officer (E & S E) Peshawar.
5. Head Mistress concerned.
6. Teacher concerned
7. Supdt. Local Office.

*[Signature]*  
District Officer (Female)  
Elementary & Secondary Education  
Peshawar

ACC  
*[Signature]*

BETTER COPY

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

**ADJUSTMENT:**

Consequent upon the placement of services at disposal of this office before the Director E & S Education Khyber Pakhtunkhwa, Peshawar vide endst No. 11183-89 dated 16.10.2012; Ms Nusrat Jehan CT GGCMS Bannu hereby temporarily adjusted at GGHS Bara Line Peshawar on need basis.

**Note:**

1. She will draw her salary from GGCMS Bannu till her proper adjustment against vacant CT
2. Charge report should be submitted to all concerned.
3. No TA/DA etc is allowed.

(Sharif Gul)  
Executive District officer  
Elementary & Secondary Education Peshawar

Endst No 4040-4/P.F Nusrat Jehan CT

Dated 20.10.2012

Copy of the above is forwarded to the :

1. District Accounts Officer Peshawar
2. PA to Director elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
3. Executive District Officer E&S Education bannu
4. PA to executive District Officer (E&SE) Peshawar
5. Head Mistress concerned
6. Teacher concerned
7. Supdt: Local Office

District Officer (Female)  
Elementary & Secondary Education  
Peshawar

ATC

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CT (F) Bannu



## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938.

9210437, 9210957, 9210468

Fax 091-9210936, 0800-33857

E-mail rafiq\_kk851@yahoo.com

### Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Female CTs B-15 are hereby promoted to the post of Female Senior CT BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior CT BPS-16 posts:-

Total No. of CT (F) Posts duly verified by the DAO	283
1/3 share of Senior CT Posts	94
Share of promotion 100 %	94
Promoted to the post of Senior CT B-16	94

S.No	Sen No	Name Of Teacher	Place Of Posting	DATE OF BIRTH	REMARKS
1	1	Sharf Un Nisa	GGMS No 1 Bannu City	08/01/1961	Services placed at the disposal of DEO (F) Bannu for further posting.
2	2	Begum Para	GGMS No 1 Bannu City	01/07/1959	---Do---
3	3	Razia Bibi	GGMS No 1 Bannu City	15/05/1962	---Do---
4	4	Kishwar Sultana	GGHS No 4 Bannu City	09/01/1963	---Do---
5	5	Robina Yousof	GGMS No 2 Bannu City	01/01/1965	---Do---
6	6	Farida Begum	GGMS Kach Kot Asad Khan Bannu	07/10/1958	---Do---
7	7	Musarat Perveen	GGMS No 2 Bannu City	17/01/1966	---Do---
8	8	Nouashad Begum	GGHS Ismal Khel Bannu	01/11/1962	---Do---
9	11	Gulshan Ara	G C M S For Girls Bannu	02/01/1969	---Do---
10	12	Razia Sultna	GGHS Mandozai Bannu	12/03/1959	---Do---
11	13	Jawaria	GGHS Abdul Ghafur Muhammad K...	15/03/1968	---Do---
12	15	Saleema Begum	GGMS No 2 Bannu City	04/04/1970	---Do---
13	16	Sabina Begum	GGMS No 2 Bannu City	11/04/1956	---Do---
14	17	Raheda Begum	GGMS Hingal Bannu	20/09/1969	---Do---
15	19	Haroon Bibi	GGHS Bazar Ahmad Khan Bannu	20/09/1966	---Do---
16	20	Rukhsana Aman	GGHS Kotka Paroz Bannu	01/04/1967	---Do---
17	21	Shakeela Akhtar	G C M S For Girls Bannu	18/10/1967	---Do---
18	22	Naila Naz	GGMS Akhundon Pir Dil Khel	02/03/1973	---Do---
19	23	Farzana Begum	GGMS Kori Sadat No.1, Bannu	17/05/1965	---Do---

Pir Zada Dil Faraz Khan.

Vice Chairman

Muthaheda Mahaz Asatza KPK

A. Z. H. H.

A. Z. H. H.

A. Z. H. H.

20	24	Robina Begum	GGMS No 2 Bannu City	17/01/1965	---Do---
21	25	Mahjabeen	GGMS Fazal Shah Mita Khel	20/03/1966	---Do---
22	26	Farzana Shaheen	G C M S For Girls Bannu	10/04/1967	---Do---
23	27	Shaista Qaisar	G C M S For Girls Bannu	20/03/1964	---Do---
24	28	Yasmin	GGMS Hassan Khel Isaki Bannu	25/04/1965	---Do---
25	30	Najma Sultan	GGHS Nar Jaffar	01/01/1968	---Do---
26	31	Shabnum Hanif	GGHS Kotka Feroz Bannu	01/04/1971	---Do---
27	32	Dil Khurm Jana	GGHS Bazar Ahmad Khan Bannu	21/07/1957	---Do---
28	33	Riffat Rana	GGMS Nazida Yousaf	01/04/1965	---Do---
29	34	Malika Farah Diba	GGMS Gul Khan Mirza Ali Khel Bannu	16/05/1966	---Do---
30	36	Dilshad Begum	GGHS s Kakki Bannu	28/11/1969	---Do---
31	37	Naima Taj	GGMS No 2 Bannu City	25/02/1964	---Do---
32	38	Hussan Iluno	GGMS Noorani Daud Shah	09/05/1964	---Do---
33	39	Shabnum Sultana	GGHS s Kakki Bannu	29/01/1968	---Do---
34	40	Nusrat Jehan	G C M S For Girls Bannu	21/04/1964	---Do---
35	41	Shakantala Rani	GGMS Koti Sadat Bannu	05/04/1967	---Do---
36	42	Najma Ihsan	GGHS Rose Gul Degau Bannu	15/01/1969	---Do---
37	43	Farida Begum	GGHS Fazal Sadiq Mendew Bannu	03/09/1968	---Do---
38	44	Naheed Begum	GGHS Dierma Khel Bannu	01/08/1970	---Do---
39	45	Ninla Raza	GGHS Kotka Daulat Khan	01/04/1969	---Do---
40	46	Shabana Hanif	GGHS Kotka Zabta Khan Kot Bali Bannu	16/09/1969	---Do---
41	47	Fahmida Khataon	GGMS Basia Khel Bannu	05/05/1958	---Do---
42	48	Neghat Seema Jana	G C M S For Girls Bannu	25/03/1971	---Do---
43	49	Hajra Bibi	GGMS No.1 Bannu	03/01/1971	---Do---
44	50	Parveen Akhtar	GGMS Mavia Killa Bannu	01/01/1973	---Do---
45	51	Shabnum Noreen	GGHS Bahadur Mughal Khel Bannu	01/10/1971	---Do---
46	52	Ume Kalsonni	GGHS Nar Shakrullah Bannu	09/01/1969	---Do---
47	53	Nazreen Syed	GGMS No.3 Bannu City	15/04/1970	---Do---
48	54	Dil Farj Jana	GGHS Bahadur Mughal Khel Bannu	07/02/1969	---Do---
49	55	Tabasum Gul	GGHS Abdul Ghafar Muhammad Khel	18/11/1959	---Do---
50	56	Rizwana Yasmin	GGMS Hassan Khel Ishaki	03/07/1972	---Do---
51	57	Salma Kawal	GGHS s Bannu City	20/03/1974	---Do---
52	58	Farkad Begum	GGHS Mandozai Bannu	10/03/1966	---Do---
53	59	Naheed Begum	GGHS Mandew Khass	09/01/1967	---Do---
54	60	Shanum Akhter	GGHS Kotka Zabta Khan	11/10/1967	---Do---
55	61	Nabila Marghoob	GGHS s Bannu City	19/01/1968	---Do---
56	62	Noor Jehan	GGMS No 3 Bannu City	05/11/1968	---Do---
57	63	Bibi Aisha	GGMS Toor Kakki	01/01/1969	---Do---
58	64	Rohila Qazi	GGHS s Shabeer Azmat Khel Bannu	20/05/1972	---Do---
59	65	Ishrat Naz	GGMS Kala Khel Masti Khan	01/06/1972	---Do---
60	66	Bibi Rozia	GGHS Salema Siikandar Khel Issaki	12/02/1972	---Do---
61	67	Nasim Begum	GGHS s Bannu City	01/04/1973	---Do---

Riaz Khan  
Secretary General  
Mutaheda Mahaz Asatza KPK

AKC  
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62	68	Khadija Begum	GGMS Lalozai Bannu	15/04/1971	---Do---
63	69	Jamshed Begum	GGMS Kot Zafer Bannu.	23/10/1975	---Do---
64	70	Nasreen Akhter	GGHS Kotka Juma Khan Bannu	10/07/1961	---Do---
65	71	Mehnaz Gul	GGHS Kotka Juma Khan Bannu	01/09/1972	---Do---
66	72	Amria Bibi	G C M S For Girls Bannu	15/04/1972	---Do---
67	73	Akhter Bibi	GGHS s Bannu City	22/07/1959	---Do---
68	74	Farzana Rehman	GGHS s Ismaili Mama Khel Bannu	08/10/1969	---Do---
69	75	Husnar Begum	GGHS s Qamar Zaman Mandew	26/10/1968	---Do---
70	76	Ismat Begum	GGHS Amandi Gul Hassan Bannu	09/06/1964	---Do---
71	77	Taj Mahal	GGHS Bangash Khel Bannu	17/03/1969	---Do---
72	78	Mehnaz Begum	GGHS s S.K.Bala Bannu	04/02/1968	---Do---
73	79	Farakh Taj Begum	GGHS Mandozai Bannu	01/04/1969	---Do---
74	80	Parveen Akhtar	GGHS s Ismaili Mama Khel Bannu	04/03/1973	---Do---
75	82	Sher Bano	GGMS Piran Tughel Khel Bannu	04/05/1965	---Do---
76	83	Nizakat Shaheen	GGHS Dheri Saidan Bannu	01/10/1974	---Do---
77	84	Shehana Hiadar	GGMS Fatima Khel Bannu	11/05/1969	---Do---
78	85	Riffat	GGMS Piran Daud Shah Bannu	30/04/1970	---Do---
79	86	Halima Bibi	GGMS Nasim Gul Baist Khel Bannu	05/05/1970	---Do---
80	87	Farzana Yasmin	GGMS Haldi Mandi	21/10/1970	---Do---
81	88	Shakila Qureshi	GGMS Gul Ahmad Shah	28/03/1972	---Do---
82	89	Kulsoom Bibi	GGMS Fiaz Talab Mandan	01/01/1973	---Do---
83	90	Nazir Fatima	GGMS Bazida Yousaf Khan	23/04/1975	---Do---
84	91	Shahnaz Khanum	G C M S For Girls Bannu	07/01/1961	---Do---
85	92	Robina Yasmin	GGMS Mandori Mati Ullah Shuh	12/03/1966	---Do---
86	93	Rajia Zaheen	GGHS Adhami Sultan Ali Bannu	01/04/1966	---Do---
87	94	Shagufta Shaheen	GGHS Qamar Zaman Mandew	20/04/1974	---Do---
88	95	Tuhira Rehman	GGMS Fiaz Talab Mandan	20/07/1966	---Do---
89	96	Farzana	GGHS s Bannu City	21/11/1972	---Do---
90	97	Shaban Yasmin	GGMS Basia Khel Bannu.	02/09/1977	---Do---
91	99	Saira Bibi	GGMS No 3 Bannu City	10/04/1958	---Do---
92	100	Tulsa Rani	GGMS Kot Adil Bannu	11/11/1964	---Do---
93	102	Farhana Begum	GGMS Mandew Khass	01/05/1969	---Do---
94	103	Israr Bibi	GGMS Hingal Bannu	01/05/1970	---Do---
95	104	Shazia Naheed	GGMS Kala Khel Msti Khan	04/01/1971	---Do---

Riaz Khan  
Secretary General  
Muthaheda Mahaz Asatza KPK

**Terms and conditions:-**

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter-caste seniority on lower post will remain intact.
6. No 100% is allowed for joining his duty.

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CT (F) Bannu 4

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 is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)  
Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

3731-26

Endst: No. / File No.2/Promotion (F) Senior CT B-16: Dated Peshawar the 21/02/2012.

- Copy forwarded for information and necessary action to the: -
1. Accountant General Khyber Pakhtunkhwa Peshawar.
  2. District Education Officers (F) Bannu.
  3. District Accounts Officer Bannu.
  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

*A* 21/2/13  
Dy: Director, Estab (Female)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

2013

ACC

PC

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER E & S EDUCATION PESHAWAR

ADJUSTMENT/

Consequent upon the placement of service at the desposal of this office by the Director Elementary & Secondary Education Khyber Pakhtun Khwa Peshawar vide order No 11183-89 Dated 16-10/2012 Mst. Nusrat Jehan CT CGHS Bara Line is readjusted in Government Girls Higher Secondary School Lady Griffith Peshawar against the vacant post in the interest of public services with immediate effect

Note: Charge report should be submitted to all concerned.  
No TA/DA etc is allowe.

(SOBIA TAHASSUMI)  
DISTRICT EDUCATION OFFICER  
FEMALE (E & S) PESHAWAR

Indst. No. 11183-89 TWTCT (P) dated 1/6/2013

Copy of the above is forwarded to the :-

- 1. Director E & S Education Khyber Pakhtunkhwa Peshawar.
- 2. Accountant General office Peshawar.
- 3. District officer Female E & S Education Bannu.
- 4. Principal/Head Mistress concerned
- 5. Teacher concerned.

*[Signature]*  
6/6  
DISTRICT EDUCATION OFFICER  
FEMALE (E & S) PESHAWAR

*[Signature]*  
*[Signature]*

Name Nussat Jahan  
(نام)

Nationality and Religion Islam Ahl-e-Sunnat  
(قومیت اور مذہب)

Residence Khugasi Khas Bamra  
(مستقل رہائش)

Father's name and residence محمد ممتاز علی  
(والد کا نام اور پتہ) خوجسری خاص بنوں

Date of birth by Christian era as nearly as can be ascertained 21-4-64  
(تاریخ پیدائش مطابق سن عیسوی)

✓  
Twenty first April, one thousand  
Nine Hundred and sixty four.

Exact height by measurement 4-5  
(قد و قامت)

Personal mark for identification  
۱۰ نشان شناخت کلہاں ہرزخم کاشان

Left hand/right hand thumb and finger-impressions of (None-gazetted) officer.  
(مرد کی صورت میں بائیں اور صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چھنگیا)

Ring Finger (چھنگیا کے ساتھ کی انگلی)

Middle Finger (بیانی)

Fore Finger (انگشت شہادت)

Thum (انگوٹھا)

Qualifications:-

- ✓ S.S.E. Exam! Year:- 1980
- ✓ R.NO. 39222. Marks:- 488
- ✓ F.A. R.No 5230 12 Marks. 423 during the Session 1982.
- ✓ P.T.C. R.No 8 12 Marks. 773 year 1984

Signature of Government servant Nussat Jahan  
(سرکاری ملازم کے دستخط)

Signature and designation of the Head of the Office, or other Attesting Officer

Zubaida Begum

Zubaida Begum

ATTESTED

The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after 5 years under this rule.  
اس صفحہ کے مندرجات ہر ۵ سالوں کے بعد تجدید ہونا ضروری ہیں اور لائن ۹-۱۰ میں دستخطوں کے



(18)  
29

9. Signature and designation of Head of the office or other attesting officer (Admin 1 to 8)	10. Date of termination or appointment	11. Reason of termination (such as promotion, transfer, dismissal)	12. Signature of the head of the office or other Attesting officer	13. Nature and duration of leave taken	14. Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debit to another Government	15. Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants
					چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تین گنا Period عرصہ Government to which debit to حکومت جسے رقم ادا کرنی		
	تاریخ انتظار ملازمت	وجوہات انتقال ملازمت ترقی تبادلہ یا برطرفی	دستخط اسر مجاز	رخصت کی نوعیت ومعیاد		دستخط اسر مجاز	سزا یا جزایا غیر مناسب کارکردگی کا ریکارڈ
					Passed 17-Fall Exam: The session Autumn 2005 upto R/NO: P-647004 with 55% marks Grade (C) from AIOU Islamabad. The degree verified from the controller of AIOU Islamabad vide his memo: no: 1796 dt: 01/04/2010. Result declared on 25/08/2006 -		
						Service Verified w.e.f. 11/2/2010 to 30/11/2011 From Aqut. Roll & other Office Record Headmistress Govt. Centennial Model School, (For Girls) Bannu	
						Service Verified w.e.f. 12-2012 to 31/3/2013 From Aqut. Roll & other Office Record Headmistress Govt. Centennial Model School (For Girls) Bannu	
						Service Verified w.e.f. 11/2/2011 to 30/11/2012 From Aqut. Roll & other Office Record Headmistress Govt. Centennial Model School (For Girls) Bannu	
					Granted Earned leave from 7/5/2012 to 26/5/2012 (20 days) on full pay Vide DCO Bannu no: 2085-86/DCO/A Dated 31/05/2012.		

ATC



1 Name of Post	2 Whether Substantive or officiating and whether permanent or temporary	3 If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II	4 Pay in substantive position		5 Additional pay for officiating		6 Other emoluments falling under the term pay	7 Date of appointment	8 Signature of Head of Office or other official in charge of the installation
			Rs.	Ps.	Rs.	Ps.			
Senior CT at HSS Kotka 31 January 2013	عارضی مستقل یا قائم مقام	B-16 (10000-800-34000) Pay revised in B-16 as notified by DES Edt: K.P.K. Pesh. vide no: 3701-06/ File No. Promotion (F) Senior CT B-16 dt. Pesh: 21/02/2013 dtd. Endst: by DEO (F) Bannu vide no: 1047-19/16 DEO (F) PFT File dated 25/03/2013							
- Do -	-		pay @ Rs- 24400/- N/Stage	(+) 800/- PMI	25800/- P.M - N	25 <sup>3</sup>	2013		

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N



(13)

1 Name of Post درجہ ملازمت	2 Whether Substantive or officiating and whether permanent or temporary عارضی مستقل یا یا قائم مقام	3 If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II اگر عارضی ہے تو رول کے مطابق پیش کیا گیا ہے؟	4 Pay in substantive position تنخواہ بطور عارضی ملازمت Rs. Ps.		5 Additional pay for officiating زائد تنخواہ بطور قائم مقام Rs. Ps.		6 Other allowances falling under the term pay ماسوائے تنخواہ دیگر الا ذلک	7 Date of appointment تاریخ تقرری	Signature of Government دورہ
Senior CT at HSS Kotka 21 Jawar Khan Khan		B-16 (10000-9000-34000)	Pay re fixed in B-16 as notified by DES		Edul: K.P.K. Desh: vide no: 3701-06/ File No-2				
- Do -			Pay @ Rs=24400/- M/stage (+) 800/- PMI		25800/P.M - M			25 <sup>3</sup> 2013	

ACC

Signal Design Office

Postal Column

(52)

32

9	10	11	12	13		14	15
Signature and Designation of the Head of the office or other attesting officer column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants
	تاریخ انتقال ملازمت	وجوہات انتقال ملازمت ترقی تاراج یا برطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	چار ماہ تک کی رخصت کے لئے اوسط آؤٹ پٹ Period Government to which debitable ہوگی	دستخط افسر مجاز	مزایا غیر مناسب کارکردگی کا دیکارڈ
					Passed 17-Eds Exam: The session Autumn 2005 with R/MO: P-647004 WITH 55% marks Grade (C) from AIOU Islamabad. The degree verified from the Controller of AIOU Islamabad vide his memo: no.: 1796 dt: 01/04/2010. Result declared on 25/08/2006 - Signature <b>HEADMISTRESS</b> Govt. Centennial Model School (For Girls) Bannu		
					service Verified w.o.t. 11/2/2010 From Aqut. Roll & other Office Record Signature <b>HEADMISTRESS</b> Govt. Centennial Model School (For Girls) Bannu	30/11/2011	
					Granted Earned leave from 7/5/2012 to 26/5/2012 (20 days) on full pay vide DCO Bannu no: 2085-8610/2012 Dated 31/05/2012. Signature <b>HEADMISTRESS</b> Govt. Centennial Model School (For Girls) Bannu		
					service Verified w.o.t. 11/2/2011 From Aqut. Roll & other Office Record Signature <b>HEADMISTRESS</b> Govt. Centennial Model School (For Girls) Bannu	30/11/2011	
					service Verified w.o.t. 11/2/2011 From Aqut. Roll & other Office Record Signature <b>HEADMISTRESS</b> Govt. Centennial Model School (For Girls) Bannu	30/11/2011	

ATC

33

8	9	10	11	12	13		14	15	
Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debitable to another Government	Period	Government to which debitable	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praise of the Government servants
دستخط سرکار ملازم	تاریخ انتظام ملازمت	وجوہات انتقال ملازمت یا بطرفی	دستخط افسر مجاز	رخصت کی نوعیت و معیار	چار ماہ کی رخصت کے لئے اوسط تنخواہ کا حصہ	عرصہ	حکومت جسے رخصت سے رقم ادا ہوگی	دستخط افسر مجاز	سزا یا جزایا غیر مناسب کارکردگی کا ریکارڈ
Transmitted/Admitted to Dist: Peshawar Suddi.							verified		08/06/2013
No. 1028-35 dt: 7/6/2013							w. o. l.	24/6/13	
D.O. (Female)							From Aqm. Roll & other	Office Record.	
E&S.E. Dist: Bar...							D.O. (Female)		E&S.E Dist: Bar...

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229  
34

9 Signature and designation of the head of the office or other attesting officer (Column 1 to 8)	10 Date of termination or appointment تاریخ انتقال ملازمت	11 Reason of termination (such as promotion, transfer, dismissal) وجوہات انتقال ملازمت ترقی تبادلہ یا برطرفی	12 Signature of the head of the office or other Attesting officer دستخط افسر مجاز	13 Nature and duration of leave taken رخصت کی نوعیت و معیار	13 Allocation of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debitable to another Government پارہ ماہ تک کی رخصت کے لئے اوسط خواہ کا تعین Period عرصہ Government to which debitable رہ ماہوں کی	14 Signature of the head of the office or other attesting Officer دستخط افسر مجاز	15 Reference to any record of punishment, censure, reward or praised of the Government servants سزا یا جزا یا غیر مناسب کارکردگی کا ریکارڈ
Transferred/Adjusted to Dist: Peshawar by Sd/- No. 1020-32 dt: 7/6/2013 D.G. (Female) E&S.E Dist: Bara					Service Verified W. G. I. 24/03/13 From: Agri. Roll & other Office Record,		08/06/2013 D.G. (Female) E&S.E Dist: Bara
Took over charge on 7/6/2013 PRINCIPAL Govt. Girls Higher Secondary School Ladygriffith Peshawar					TR No. 232 Date 10/7/13 Drawn Rs. 3690 = 3568 ENAIC of Pay & Allowance due to Promotion W.C. 253 = 21 to 20-6-13 Asstt. Accounts Officer P.O. Office Peshawar 22/7/13		22/7/13
13/11 Drawn 10000 = 2667 = Net = 7333 = on 07/12/13 From 9/5/13 to 10/07/13 & 2667 has been received and drawn in 10/07/13 REC					22/7/13		22/7/13



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

OFFICE ORDER/

The competent authority is pleased to order the transfer of Ms. Nusrat Jahan, SCT GGHSS Lady Griffith Peshawar to GGHS Islamia Collegiate Peshawar against vacant post in the interest of public service.

Note: - Charge report should be submitted to all concerned.  
No TA/DA etc is allowed.

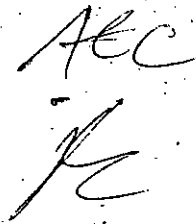
(ULFAT BEGUM)  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR.

Endst: No. 4711-16 /P.F. Nusrat, SCT Dated 22/7 /2016.

Copy of the above is forwarded to the:-

1. Accountant General Khyber Pakhtun Khwa Peshawar.
2. Head Mistresses/Principals concerned.
3. Official concerned.
4. Cashier local office.
5. P.A. DEO (F) local office.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR.





(FEMALE) PESHAWAR.

NO. \_\_\_\_\_ / PF Nusrat Jehan CT

DATED PESHAWAR THE 4/12/2019

To

The Principal  
GGHS Islamia Collegiate  
Peshawar

Subject: RECOVERY OF OVERPAYMENT AMOUNT IN R/O MST. NUSRAT JEHAN CT BS-15.

Memo:-

Reference to the subject cited above and to state that Mst. Nusrat Jehan was promoted from CT BS-15 to SCT BS-16 in District Bannu and after her promotion she has requested for her transfer to District Peshawar. Her service was placed at the disposal of DEO (F) Office Peshawar vide Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Endst: No. 11183-89 dated 16/10/2012 for adjustment against vacant CT post. The DEO (F) Office Peshawar was initially adjusted against the CT BS-15 post at GGHS Bara line Peshawar vide this Office Endst: No.4040-47 dated 20/10/2012, then after she was re-adjusted at GGHS Lady Griffith Peshawar vide DEO (F) Office Peshawar Endst: No.7828-32 dated 7/6/2013. Later on she was transferred to GGHS Islamia Collegiate Peshawar vide Endst: No.4711-16 dated 22/7/2016. It is pertinent to mention here that the Govt. of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) has issued Inter District Posting/Transfer policy vide No.SOR-IV/ E&AD/1-4/2010/Vol-VIII dated Peshawar the 2011 at Provincial level as well from settled in FATA and vice versa as follows:-

"No Inter District transfer should be allowed to a post which is required to be filled in by "Promotion"

"A person so transferred shall be placed at the bottom of the cadre strength which he joins for the purpose of determining his seniority vis-a-vis other members born on the cadre". Mst. Nusrat Jehan was transferred as CT BS-15 from GGCMS Bannu to GGHS Lady Griffith Peshawar vide this office Endst: No.7828-32 dated 7/6/2013, but unfortunately wrong entry of SCT BS-16 made in her Service Book instead of CT BS-15 due to which she paid salary of BS-16 instead of BS-15.

Therefore overpayment made to the teacher concerned may be recovered from her immediately and revised entry may be made in her Service Book accordingly under intimation to this Office.

Encl: Org: S/Book

DISTRICT EDUCATION OFFICER.  
(FEMALE) PESHAWAR

Endst: No. 5160-62

Copy for information to the:-

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar
2. Accountant General Office Khyber Pakhtunkhwa Peshawar.
3. Teacher concerned.

DISTRICT EDUCATION OFFICER.  
(FEMALE) PESHAWAR

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seniority  
03/12/19  
All  
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To

THE SECRETARY SCHOOLS & EDUCATION,  
KHYBER PAKHTUNKHWA, PESHAWAR

(28) H

3-3

Subject: - DEPARTMENTAL APPEAL UNDER SECTION 22 OF  
THE CIVIL SERVANT ACT AGAINST THE ORDER  
DATED 04/12/2019, WHEREBY THE ORDER IN  
RESPECT OF RECOVERY OF OVERPAYMENT WAS  
ISSUED TO THE APPELLANT.

RESPECTED SIR,

The appellant submit as under: -

With due respect it is stated that, I am performing my duties as JCT Teacher, at GGHS Islamia collegiate, Peshawar. I was initially appointed on dated :<sup>1994</sup>25/11/2014 on the post of CT at district Bannu after my appointment I had joined the same post at district Bannu, thereafter I was performing my duty with the great zeal and zest and I had got detachment from my husband in the year 2012 and requested for temporary adjustment at district Peshawar on the same terms and conditions which was allowed by the competent authority vide dated 20/10/2012 and I have been temporary adjusted at GGHS Bara line Peshawar on need basis on the date mentioned above, moreover the office of district education officer issued another transfer order in respect of my readjustment on dated:- 07/06/2013 from the above mentioned school to GGHS Lady grift Peshawar. It is pertinent to mentioned here that prior to my transfer order from district Bannu my promotion was due and accordingly the departmental promotion committee which was held on 16/07/2012 I have been promoted by the same departmental promotion committee to BPS-16 that as I have been promoted in 2013 and accordingly the entries in respect of my promotion had been made and thereafter I had received the promotion benefits which was dully issued by the competent authority after holding departmental promotion committee. Now the honorable district education officer has issued order dated :-04/12/2019 in respect of


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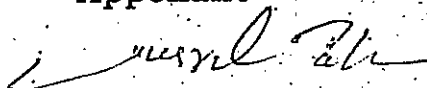
3

recovery of over payment which may receive on the basis of promotion and I have been directed to deposit the over payment which is illegal against the natural justice as I being a female having children and residing separately from my husband since 2012 and I can't afford the same and it is a past and closed transactions as per the principle of locus poenitentiae and I have correctly been promoted for the BPS-16.

It is therefore humbly prayed that on acceptance of my instant application the order dated 04/12/2019 in respect of recovery excess payment and salaries my kindly be withdrawn /cancelled for the best interest of justice.

  
PRINCIPAL  
Govt. Girls' School  
Islamia Collegiate Peshawar

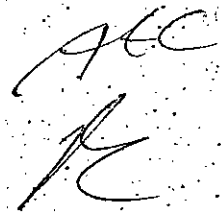
Appellant



NUSRAT JEHAN  
SCT GGHS

Islamia Collegiate Peshawar

Dated: 24/12/2019





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
No. SO(PE)/2-8/DSC/2020  
Dated Peshawar the 08.01.2020

(38)

40

To,

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

Subject: - DEPARTMENTAL APPEAL UNDER SECTION 22 OF THE CIVIL SERVANT ACT AGAINST THE ORDER DATED 04.12.2019, WHEREBY THE ORDER IN RESPECT OF RECOVERY OF OVERPAYMENT WAS ISSUED TO THE APPELLANT

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of letter No. 669 dated 31.12.2019 received from Principal, Govt. Girls High School, Islamia Collegiate Peshawar alongwith connected documents, for further necessary action as per rules/policy, please.

Yours faithfully,

Encl: As above

-sd-

Endst: No & date even  
Copy forwarded to:-

SECTION OFFICER (PRIMARY)

1. The DEO (Female), District Peshawar, for similar necessary action.
2. PS to Secretary, Elementary & Secondary Education Department, Peshawar.

-sd-

SECTION OFFICER (PRIMARY)

ACC

B

DISTRICT EDUCATION OFFICER,  
(FEMALE) PESHAWAR.

NO. 143 / PF Nusrat Jehan CT

DATED PESHAWAR THE 14/8/2020

41

To  
The Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

Subject: - DEPARTMENTAL APPEAL UNDER SECTION-22 OF THE CIVIL SERVANT ACT AGAINST THE ORDER DATED 04/12/2019 WHEREBY THE ORDER IN RESPECT OF RECOVERY OF OVERPAYMENT WAS ISSUED TO THE APPELLANT

Memo:- Kindly Refer to your letter No.8216/ U.No.3014/Vol-1/Appeal Peshawar dated 07/02/2020 on the subject cited above and to state that Mst. Nusrat Jehan was promoted from CT BS-15 to SCT BS-16 in District Bannu and after her promotion she has requested for her transfer to District Peshawar. Her service was placed at the disposal of DFO (F) Office Peshawar vide Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Endst. No. 11183-89 dated 16/10/2012 for adjustment against vacant CT post. This Office was initially adjusted her against the CT BS-15 post at GGHS Bara line Peshawar vide this Office Endst. No.4040-47 dated 20/10/2012, then after site was re-adjusted at GGHS Lady Griffith Peshawar vide this Office Endst. No.7828-32 dated 7/6/2013. Later on she was transferred to GGHS Islamia Collegiate Peshawar vide Endst. No.4711-16 dated 22/7/2016. It is pertinent to mention here that the Govt. of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) has issued Inter District Posting/Transfer policy vide No SCOR-IV/ E&AD-1-4/2010/Vol-VIII dated Peshawar the 2011 at Provincial level as well from settled to FATA and vice versa as follows:-

"No Inter District transfer should be allowed to a post which is required to be filled in by "Promotion"  
"A person so transferred shall be placed at the bottom of the cadre strength which he joins for the purpose of determining his seniority vis-a-viz other members born on the cadre". Similarly Mst. Nusrat Jehan was transferred as CT BS-15 from GGMS Bannu to GGHS Lady Griffith Peshawar vide this office Endst. No.7828-32 dated 7/6/2013, but unfortunately wrong entry of SCT BS-16 made in her Service Book instead of CT BS-15 due to which she paid salary of BS-16 instead of BS-15

Therefore this office issued a letter to the Principal GGHS Islamia Collegiate Peshawar vide No. 5159 dated 4/12/2019 with direction that overpayment made to the teacher concerned may be recovered from her and revised entry may be made in her Service Book accordingly under intimation to this Office. Hence detail report is submitted please.

DISTRICT EDUCATION OFFICER,  
(FEMALE) PESHAWAR

Endst. No. 143

Copy to the:-

Director, Department

14/8/20

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR**

**SERVICE APPEAL NO.3317/2020**

Nusrat Jehan.....Appellant

Vs

Govt: of KPK & Others.....Respondents

**REPLY ON BEHALF OF RESPONDENTS.**

Respectively Sheweth:

The Respondents submit as under:

**PRELIMINARY OBJECTIONS:**

1. That the Appellant has got no cause of action and locus standi.
2. That the Appellant has concealed material facts from this Hon' ble Tribunal.
3. That the Appellant has been estopped by her own conduct to file the instant appeal before this Hon'ble Tribunal.
4. That the instant Appeal is badly time barred.
5. That the instant Appeal is not maintainable in its present form.
6. That the instant Appeal is bad for mis- joinder and non- joinder of the necessary and proper parties.
7. That the Appellant has not come with clean hands to this Hon'ble Tribunal.
8. That the instant Appeal is barred by law.

**ON FACTS.**

1. That Para No.1 pertains to record.
2. That Para No.2 also pertains to record.
3. That Para No.3 pertains to record.
4. That Para No.4 pertains to record.
5. That Para No.5 pertains to record.
6. That Para No.6 pertains to record.
7. That Para No .7 is incorrect, misleading and against the facts. The appellant was temporarily adjust on need basis against C.T post in G.G.H.S Bara Line Peshawar (BPS-15) with the direction that she will draw her salary from her original post at District Bannu. As she was at the payroll of D.E.O female bannu, she was promoted to the post of S.C.T on date 21/02/2013. (Copy attached). Later on she was properly readjusted against the recant post of C.T (B.P.S 15) at G.G.H.S.S Lady Graft vide order no.2828-32 dated 7/6/2013 (copy attached). But she was continuously drawing her salary in B.P.S 16 instead of B.P.S 15. While during the updating of the seniority of C.T and S.C.T it was noticed that the appellant had drawn her salary against the post of S.C.T (BPS-16) instead of C.T (B.P.S 15). Therefore, She was placed at her legal S.No of seniority on her turn in district Peshawar as per rules, and the over payment made to the appellant was directed to be recovered in installments. (Annexure A, B & C).
8. Reply of Para No.8 has already been given in Para No 7 ibid.
9. That the Appellant has no cause of action to file the instant appeal in this Hon'ble Tribunal.

Detail reply on grounds of appeal is as under:

**GROUND**

- A. That Ground-A is legal hence no comments.
- B. That Ground-B is misleading. The act of the respondent is legal and according to law and rules.
- C. That Ground-C is incorrect and misleading. The detail reply has been given in the facts Para.
- D. That Ground-D is incorrect and misleading. The appellant was adjusted in District Peshawar on her original post as in district Bannu.i.e BPS-15.

Accepted  
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کبار  
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E. That Ground-E is also incorrect and misleading. The said precedent is not applicable on the case of the appellant.

F. That Ground – F is incorrect and misleading. The detail reply has been given in the above Para.

G. That Ground-G is also incorrect and misleading. The Respondent Department acted according to law and rules.

H. That the Respondent also seeks permission to submit other case grounds and proofs at the time of arguments.

It is therefore, very humbly prayed that on acceptance of this reply, the instant appeal being illegal, against law and facts, and may very kindly be dismissed with cost.

*B. Khan*  
*12/01/2021*  
District Education Officer (Female)

Peshawar ↗



19

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

**ADJUSTMENT**

Consequent upon the placement of services at disposal of this office by the Director E & S Education Khyber Pakhtunkhwa Peshawar vide Office order issued under Endst. No. 11183-89 dated 16/10/2012, Ms. Nusrat Jehan C.T.G. G.C.M.S Bannu hereby temporarily adjusted at G.C.M.S Bara Line Peshawar on need basis.

Note:-

- ➔ 1. She will draw her salary from G.C.M.S Bannu till her proper adjustment against vacant C.T.
- 2. Charge report should be submitted to all concerned.
- 3. No TADA etc is allowed.

(SHARIF GUL)  
Executive District Officer  
Elementary & Secondary Education Peshawar

Endst. No. 4040-47 / P.F. Nusrat Jehan C.T. Dated 20/10 2012.

Copy of the above is forwarded to the:

- 1. District Accounts Officer Peshawar.
- 2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3. Executive District Officer E & S Education Bannu.
- 4. PA to Executive District Officer (E & S E) Peshawar.
- 5. Head Mistress concerned.
- 6. Teacher concerned.
- 7. Supdt. Local Office.

*[Signature]*  
District Officer (Female)  
Elementary & Secondary Education  
Peshawar

*[Handwritten initials]*  
AEC  
*[Handwritten signature]*



CT (F) Bannu



## Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

PH No. 091-9210389, 9210938,  
9210437, 9210957, 9210468  
Fax 091-9210936, 0800-33857  
E-mail rafiq\_kk851@yahoo.com

### Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(B&A)/1-18/ESSE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Female CTs B-15 are hereby promoted to the post of Female Senior CT BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior CT BPS-16 posts:-

Total No. of CT (F) Posts duly verified by the DAO	383
1/3 share of Senior CT Posts	94
Share of promotion 100 %	94
Promoted to the post of Senior CT B-16	94

S.No	Sen No	Name Of Teacher	Place Of Posting	DATE OF BIRTH	REMARKS
1	1	Sharf Un Nisa	GGMS No 1 Bannu City	08/01/1961	Services placed at the disposal of DEO. (F) Bannu for further posting.
2	2	Begum Para	GGMS No 1 Bannu City	01/07/1959	---Do---
3	3	Razia Bibi	GGMS No 1 Bannu City	15/05/1962	---Do---
4	4	Kishwar Sultana	GGHS No 4 Bannu City	09/01/1963	---Do---
5	5	Robina Yousaf	GGMS No 2 Bannu City	01/01/1965	---Do---
6	6	Farida Begum	GGMS Kachi Kot Asad Khan Bannu	07/10/1958	---Do---
7	7	Musarat Perveen	GGMS No 2 Bannu City	17/01/1966	---Do---
8	8	Nouashad Begum	GGHS Ismail Khel Bannu	01/11/1962	---Do---
9	11	Gulshan Ara	G C M S For Girls Bannu	02/11/1969	---Do---
10	12	Razia Sultana	GGHS Mandozai Bannu	12/03/1959	---Do---
11	13	Jumaria	GGHS Abdul-Ghaffar Muhammad E.	15/03/1968	---Do---
12	15	Saleema Begum	GGMS No 2 Bannu City	04/04/1970	---Do---
13	16	Sabiha Begum	GGMS No 2 Bannu City	13/04/1956	---Do---
14	17	Rohaida Begum	GGMS Hijal Bannu	20/09/1969	---Do---
15	19	Haroon Bibi	GGHS Bazair Ahmad Khan Bannu	20/09/1966	---Do---
16	20	Rukhsana Aman	GGHS Kotka Faraz Bannu	01/04/1967	---Do---
17	21	Shakeela Akhtar	G C M S For Girls Bannu	18/10/1967	---Do---
18	22	Naila Naz	GGMS Akhundhan Pir Dil Khel	02/03/1973	---Do---
19	23	Farzana Begum	GGMS Kafi Sodat No.1, Bannu	17/05/1965	---Do---

Pir Zada Dil Faraz Khan,  
Vice Chairman  
Muthahada Mahaz Asatira KPK

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20	24	Robina Begum	GGMS No 2 Bannu City	17/01/1965	---Do---
21	25	Mahjabeen	GGMS Fazal Shah Mita Khel	20/03/1966	---Do---
22	26	Farzana Shaheen	G C M S For Girls Bannu	10/04/1967	---Do---
23	27	Shaista Qaisar	G C M S For Girls Bannu	20/03/1964	---Do---
24	28	Yasmin	GGMS Hassan Khel Isaki Bannu	25/04/1965	---Do---
25	30	Najma Sultan	GGHS Nar Jaffar	01/01/1968	---Do---
26	31	Shabnum Hanif	GGHS Kotka Feroz Bannu	01/04/1971	---Do---
27	32	Dil Khurm Jana	GGHS Bazar Ahmad Khan Bannu	21/07/1957	---Do---
28	33	Riffat Rana	GGMS Nazida Yousef	01/04/1965	---Do---
29	34	Malika Parah Diba	GGMS Gul Khan Mirza Ali Khel Bannu	16/05/1966	---Do---
30	36	Dilshad Begum	GGHS s Kakki Bannu	28/11/1969	---Do---
31	37	Naima Taj	GGMS No 2 Bannu City	25/02/1964	---Do---
32	38	Hussan Bano	GGMS Noorani Daud Shah	09/05/1964	---Do---
33	39	Shabnum Sultana	GGHS s Kakki Bannu	29/01/1968	---Do---
34	40	Nusrat Jehan	G C M S For Girls Bannu	21/04/1964	---Do---
35	41	Shakaniala Rani	GGMS Koti Sadat Bannu	05/04/1967	---Do---
36	42	Najma Hisan	GGHS Rose Gul Degun Bannu	15/01/1969	---Do---
37	43	Farida Begum	GGHS Fazal Sadiq Mendew Bannu	03/09/1968	---Do---
38	44	Naheed Begum	GGHS Dierma Khel Bannu	01/08/1970	---Do---
39	45	Nitla Raza	GGHS Kotka Daulat Khan	01/04/1969	---Do---
40	46	Shabana Hanif	GGHS Kotka Zabta Khan Kot Bali Bannu	16/09/1969	---Do---
41	47	Fahmida Khatoon	GGMS Basia Khel Bannu	05/05/1958	---Do---
42	48	Naghat Seema Jana	G C M S For Girls Bannu	25/03/1971	---Do---
43	49	Hajra Bibi	GGMS No.1 Bannu	03/01/1971	---Do---
44	50	Parveen Akhtar	GGMS Mauja Killa Bannu	01/01/1973	---Do---
45	51	Shabnum Norcen	GGHS Bahadur Mughal Khel Bannu	01/10/1971	---Do---
46	52	Ume Kalsoom	GGHS Nar Shakrullah Bannu	09/01/1969	---Do---
47	53	Nazneen Syed	GGMS No.3 Bannu City	15/04/1970	---Do---
48	54	Dil Farj Jana	GGHS Bahadur Mughal Khel Bannu	07/02/1969	---Do---
49	55	Tabasum Gul	GGHS Abdul Ghafer Muhammad Khel	18/11/1959	---Do---
50	56	Rizwana Yasmin	GGMS Hassan Khel Isaki	01/07/1972	---Do---
51	57	Solma Kawal	GGHS s Bannu City	20/03/1974	---Do---
52	58	Farkad Begum	GGHS Mandozai Bannu	10/03/1966	---Do---
53	59	Naheed Begum	GGHS Mandew Khass	09/01/1967	---Do---
54	60	Shamin Akhter	GGHS Kotka Zabta Khan	11/10/1967	---Do---
55	61	Nabila Marghoob	GGHS s Bannu City	19/01/1968	---Do---
56	62	Noor Jehan	GGMS No 3 Bannu City	05/11/1968	---Do---
57	63	Bibi Aisha	GGMS Toor Kakki	01/01/1969	---Do---
58	64	Rohila Qazi	GGHS s Shabaz Azmat Khel Bannu	20/05/1972	---Do---
59	65	Ishrat Nuz	GGMS Kala Khel Masti Khan	01/06/1972	---Do---
60	66	Bibi Rozia	GGHS Salema Sikkandar Khel Issaki	12/02/1972	---Do---
61	67	Nesim Begum	GGHS s Bannu City	01/04/1973	---Do---

Riaz Khan  
Secretary General  
Muthahada Mahaz-Asatza KPK

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52	68	Khadija Begum	GGMS Lalozai Bannu	15/04/1971	---Do---
53	69	Jumshed Begum	GGMS Kot Zafer Bannu	23/10/1975	---Do---
64	70	Nasreen Akhter	GGHS Kotka Juma Khan Bannu	10/07/1961	---Do---
65	71	Mehnaz Gul	GGHS Kotka Juma Khan Bannu	01/09/1972	---Do---
66	72	Amra Bibi	G C M S For Girls Bannu	15/04/1972	---Do---
67	73	Akhter Bibi	GGHS s Bannu City	22/07/1959	---Do---
68	74	Farzana Rehman	GGHS s Ismaili Mama Khel Bannu	08/10/1969	---Do---
69	75	Husnar Begum	GGHS s Qamar Zaman Mandew	26/10/1968	---Do---
70	76	Isnat Begum	GGHS Amandi Gul Hassan Bannu	09/06/1964	---Do---
71	77	Taj Mahal	GGHS Bangash Khel Bannu	17/03/1969	---Do---
72	78	Mehnaz Begum	GGHS s S.K. Bala Bannu	04/02/1968	---Do---
73	79	Farakh Taj Begum	GGHS Mandozai Bannu	01/04/1969	---Do---
74	80	Parveen Akhtar	GGHS s Ismaili Mama Khel Bannu	04/03/1973	---Do---
75	82	Sher Bano	GGMS Piran Tughal Khel Bannu	04/05/1965	---Do---
76	83	Nizakat Shaheen	GGHS Dheri Saidan Bannu	01/10/1974	---Do---
77	84	Shchana Hiadar	GGMS Fatima Khel Bannu	11/05/1969	---Do---
78	85	Riffat	GGMS Piran Daud Shahi Bannu	30/04/1970	---Do---
79	86	Halima Bibi	GGMS Nasim Gul Baist Khel Bannu	05/05/1970	---Do---
80	87	Farzana Yasmin	GGMS Haldi Mandi	21/10/1970	---Do---
81	88	Shakila Qureshi	GGMS Gul Ahmad Shah	28/03/1972	---Do---
82	89	Kalsoom Bibi	GGMS Fiaz Talab Mandan	01/01/1973	---Do---
83	90	Nazir Fatima	GGMS Bazida Yousuf Khan	23/04/1975	---Do---
84	91	Shahmaz Khanum	G C M S For Girls Bannu	07/01/1961	---Do---
85	92	Robina Yasmin	GGMS Mandauri Kyati Ullah Shah	12/02/1966	---Do---
86	93	Rafia Zaheen	GGHS Adhami Sulaim Ali Bannu	01/04/1966	---Do---
87	94	Shagufa Shaheen	GGHS Qamar Zaman Mandew	20/04/1974	---Do---
88	95	Tahira Rehman	GGMS Fiaz Talab Mandan	20/07/1960	---Do---
89	96	Farzana	GGHS s Bannu City	21/11/1972	---Do---
90	97	Shaban Yasmin	GGMS Basia Khel Bannu	02/09/1977	---Do---
91	99	Saira Bibi	GGMS No 3 Bannu City	10/04/1958	---Do---
92	100	Tulsa Rani	GGMS Kor Adil Bannu	11/11/1964	---Do---
93	102	Farhana Begum	GGMS Mandew Khass	01/05/1969	---Do---
94	103	Israr Bibi	GGMS Hinjal Bannu	01/05/1970	---Do---
95	104	Shazia Naheed	GGMS Kala Khel Masti Khan	04/01/1971	---Do---

**Terms and conditions:-**

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their inter-se seniority on lower post will remain intact.
- 6 No leave is allowed for joining his duty.

Riaz Khan  
Secretary General  
Muthaheda Mahaz Asatza KPK

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CT (F) Bannu

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- 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 is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)  
Director  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar.

3751-56

Endst: No. / File No.2/Promotion (F) Senior CT B-16: Dated Peshawar the 21/02/2012.

- Copy forwarded for information and necessary action to the:-
1. Accountant General Khyber Pakhtunkhwa Peshawar.
  2. District Education Officers (F) Bannu.
  3. District Accounts Officer Bannu.
  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

A 21/2/12  
Dy: Director Estab (Female)  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

ACC  
PC

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1 Name of Post درجہ ملازمت	2 Whether Substantive or officiating and whether permanent or temporary عارضی مستقل یا یا قائم مقام	3 If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II اگر عارضی ہے تو رول کے مطابق پیش کیا گیا ہے؟	4 Pay in substantive position تجوڑاہ بطور عارضی ملازمت Rs. Ps.		5 Additional pay for officiating زائد تجوڑاہ بطور قائم مقام Rs. Ps.		6 Other emoluments falling under term pay ماسوائے تجوڑاہ دیگر الا ذلک	7 Date of appointment تاریخ تقرری	8 Signature of the Officer in Charge of the Station مقررہ ایجنسی کے سربراہ کی دستخط
Senior CT at HSS Kotka 31 January 2013		B-16 (10000-800-34000)							
		pay & fixed in B-16 as notified by DEO Edt: K.P.K. Desh: vide No. 3701-06/ File No. Promotion (F) Senior CT B-16 dt Desh: 21/02/2013 dt & Endst: by DEO (F) Bannu vide No. 1847-1746 DEO (F) PFT File dated 25/03/2013							
- Do -		pay @ Rs= 24400/ M/Stage							
		(+ ) 800/ PMI							
		25200/ P.M - dt 25/3/2013							

Acc

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

ADJUSTMENT

Consequent upon the placement of service at the desposal of this office by the Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar vide order No. 11183-89 Dated 16-10/2012. Ms. Nusrat Jehan, CT, GGHS, Bara Line is readjusted at Government Girls Higher Secondary School Lady Griffith Peshawar against the vacant post in the interest of public services with immediate effect.

Note: Charge report should be submitted to all concerned.  
No TA/DA etc is allowed.

(SOBIA FARHASSUMI)  
DISTRICT EDUCATION OFFICER  
FEMALE (E & S) PESHAWAR

Encl. No. 1-7-1-2-39 / 101 C T (P) dated 1/6/2013

Copy of the above is forwarded to the :-

- 1. Director E & S Education Khyber Pakhtunkhwa Peshawar
- 2. Accountant General office Peshawar
- 3. District officer Female E & S Education Bannu
- 4. Principal/Head Mistress concerned
- 5. Teacher concerned.

DISTRICT EDUCATION OFFICER  
FEMALE (E & S) PESHAWAR

Handwritten signature and date: 1/6/13

Handwritten initials: AHC

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

OFFICE ORDER/

The competent authority is pleased to order the transfer of Ms. Nusrat Jahan, SCT GGHS Lady Griffith Peshawar to GGHS Islamia Collegiate Peshawar against vacant post in the interest of public service.

Note: - Charge report should be submitted to all concerned.  
No TA/DA etc is allowed.

(ULFAT BEGUM),  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR.

Endst: No. 4711-16 /P: F. Nusrat, SCT Dated 22/7 /2016.

Copy of the above is forwarded to the:-

1. Accountant General Khyber Pakhtun Khwa Peshawar.
2. Head Mistresses/Principals concerned.
3. Official concerned.
4. Cashier local office.
5. P.A. DEO (F) local office.

(Signature)  
DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR.

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DISTRICT EDUCATION OFFICE.  
(FEMALE) PESHAWAR.

NO. \_\_\_\_\_ / PF Nusrat Jehan.CT

DATED PESHAWAR THE 4/12/2019

To

The Principal  
GGHS Islamia Collegiate  
Peshawar

Subject: RECOVERY OF OVERPAYMENT AMOUNT IN R/O MST. NUSRAT JEHAN  
CT BS-15

Memo:-

Reference to the subject cited above and to state that Mst. Nusrat Jehan was promoted from CT BS-15 to SCT BS-16 in District Bannu and after her promotion she has requested for her transfer to District Peshawar. Her service was placed at the disposal of DEO (F) Office Peshawar vide Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar Endst: No. 11183-89 dated 16/10/2012 for adjustment against vacant CT post. The DEO (F) Office Peshawar was initially adjusted against the CT BS-15 post at GGHS Bara line Peshawar vide this Office Endst: No.4040-47 dated 20/10/2012, then after she was re-adjusted at GGHS Lady Griffith Peshawar vide DEO (F) Office Peshawar Endst: No.7828-32 dated 7/6/2013. Later on she was transferred to GGHS Islamia Collegiate Peshawar vide Endst: No.4711-16 dated 22/7/2016. It is pertinent to mention here that the Govt. of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) has issued Inter District Posting/Transfer policy vide No.SOR-IV/E&AD/1-4/2010/Vol-VIII dated Peshawar the 2011 at Provincial level as well from sented to FATA and vice versa as follows:-

"No Inter District transfer should be allowed to a post which is required to be filled in by "Promotion"

"A person so transferred shall be placed at the bottom of the cadre strength which he joins for the purpose of determining his seniority vis-a-viz other members born on the cadre". Mst. Nusrat Jehan was transferred as CT BS-15 from GGHS Bannu to GGHS Lady Griffith Peshawar vide this office Endst: No.7828-32 dated 7/6/2013. (but unfortunately wrong entry of SCT BS-16 made in her Service Book instead of CT BS-15 due to which she paid salary of BS-16 instead of BS-15.)

Therefore overpayment made to the teacher concerned may be recovered from her immediately and revised entry may be made in her Service Book accordingly under intimation to this Office.

Encl: Org: S/Book

DISTRICT EDUCATION OFFICER,  
(FEMALE) PESHAWAR

Endst: No. 5160-62

Copy for information to the:-

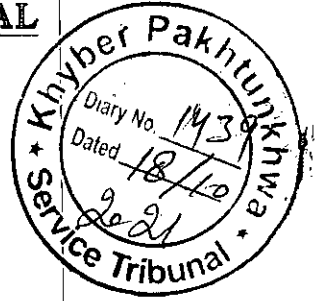
1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. Accountant General Office Khyber Pakhtunkhwa Peshawar.
3. Teacher concerned.

DISTRICT EDUCATION OFFICER,  
(FEMALE) PESHAWAR

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**BEFORE THE LEARNED SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA, PESHAWAR**



CM No. \_\_\_\_\_/2021

In Re:

Appeal No. 3317 /2020

*Put up to the worthy chairman with relevant appeal.*

**Nusrat Jehan .....Appellant**

**VERSUS**

*21/10/21* **Govt of KPK & others.....Respondents**

**APPLICATION FOR EARLY**

**HEARING**

*NFA 02/11/2021*  
**Respectfully Sheweth:**

1. That the above titled Appeal is pending adjudication before this Honourable Court which is fixed for 3.01.2022.
2. That the instant Appeal is pending adjudication since long and the comments has already been submitted by the Respondents and the same Appeal has been argued so many time but due to the request of learned AAG, the same was time and again adjourned, moreover the promotion of the Appellant is due and the name of the Appellant is being forwarded and placed before the DSB, which is probably be scheduled in this month Or first week of the December, therefore,

**BEFORE THE LEARNED SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA, PESHAWAR**

CM No. \_\_\_\_\_/2021

In Re:

Appeal No. 3317/2020

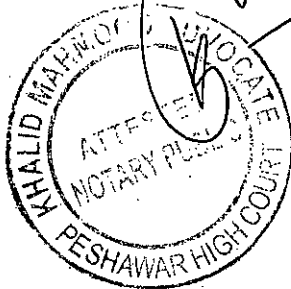
**Nusrat Jehan .....Appellant**

**VERSUS**

**Govt of KPK & others.....Respondents**

**AFFIDAVIT:**

It is stated on oath that the contents of the instant Application are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.



**DEPONENT**



**KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

No. 940 /ST

Dated: 15/4 /2022

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281  
Fax:- 091-9213262

To

The District Education Officer Female,  
Government of Khyber Pakhtunkhwa  
Peshawar.

Subject: JUDGMENT IN APPEAL NO. 3317/2020 MST. NUSRAT JEHAN.

I am directed to forward herewith a certified copy of Judgement dated 02.02.2022 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR

KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR