

06.05.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 24.08.2021 for the same as before.


Reader

24.08.2021

Nemo for the appellant. Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as her counsel and to come up for preliminary hearing before the S.B on 24.11.2021.

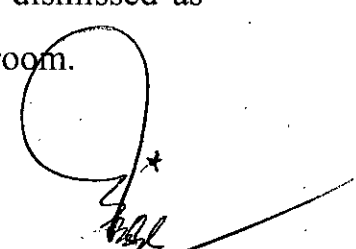

(SALAH-UD-DIN)
MEMBER (J)

24.11.2021

Counsel for the appellant present.

Learned counsel for the appellant submitted an application for withdrawal of the instant service appeal which is placed on file. Application is accepted and the instant service appeal in hand is therefore, dismissed as withdrawn. File be consigned to the record room.

Announced:
24.11.2021


(Mian Muhammad)
Member(E)

BEFORE HON'BLE SERVICE TRIBUNAL, K.P. PESHAWAR.

YATIYA BEGUM Vs Govt of K.P.

Application for Withdrawal of the above
titled Appeal.

Respectfully Sheweth:

The applicant most humbly submit as under:

- 1- That -the titled Appeal was Pending adjudication before this Hon'ble Tribunal.
2. That -the impugned Seniority list is now amended and now the controversy is resolved Therefore the appellant want withdrawal of the appeal in hand.

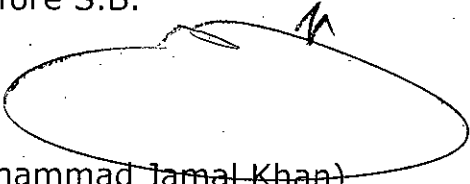
It is therefore, most humbly requested that while on the acceptance of this application the appeal in hand may kindly be withdrawn.

Dated 24-11-21

Appellant
Through
Attaq
Attaq Abbas Attu

21.10.2020

Since the Members of the High Court as well as of the District Bar Association Peshawar are observing strike today therefore, the case is adjourned to 13.11.2020 on which date to come up for preliminary hearing before S.B.

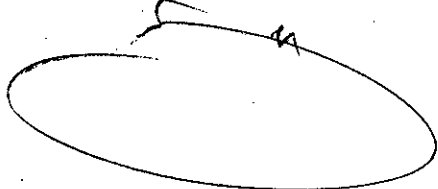


(Muhammad Jamal Khan)
Member (Judicial)

13.11.2020

Nemo for the appellant.

Since the Members of the High Court as well as of the District Bar Associations, Peshawar, are observing strike today, therefore, learned counsel for appellant is not available today. Adjourned to 28.01.2021 on which date to come up for preliminary hearing before S.B.



(Muhammad Jamal Khan)
Member (Judicial)

28.01.2021

Mr. Muhammad Naeem, husband of the appellant, on behalf of the appellant is present. He submitted that learned counsel for appellant is busy in the Hon'ble Peshawar High Court, Peshawar, and requested for adjournment. Request is acceded to, the appeal is adjourned to 06.05.2021 on which date file to come up for preliminary hearing before S.B.






(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 9409 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/08/2020	<p>The appeal of Yahya Begum presented today by Mr. Athar Abbas Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	21.09.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>21/09/2020</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Nemo for the appellant.</p> <p>Notice be issued to appellant/counsel for preliminary hearing on 24.11.2020 before S.B.</p> <p style="text-align: right;"> Chairman</p>

**BEFORE THE HON'BLE CHAIRMAN KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR**

In Ref.
S.A 9409/2020

YAHYA BEGUM

APPELLANT

VERSUS

GOVT: OF KHYBER PAKHTUNKHWA, THROUGH CHIEF
SECRETARY AND OTHERS

RESPONDENTS

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APPELLANT

Dated: 18-8-20

Through:

Athar Abbas
Advocates High Court,
Peshawar

①

BEFORE THE HON'BLE CHAIRMAN KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

In Ref.
S.A 9409/2020

Diary No. 8959

Dated 19-8-2020

YAHYA BEGUM W/O MUHAMMAD NAEEM R/O UNIVERSITY
TOWN PESHAWAR.

APPELLANT

VERSUS

1. GOVT: OF KHYBER PAKHTUNKHWA THROUGH CHIEF
SECRETARY, CIVIL SECRETARIAT PESHAWAR.
2. SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION, PESHAWAR.
3. DIRECTOR, DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION, PESHAWAR.

RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT 1974 ON ACCEPTANCE OF THIS
APPEAL AN APPROPRIATE ORDER/DIRECTION TO THE
RESPONDENTS MAY BE ISSUED FOR MAKING CORRECTION
IN THE IMPUGNED FINAL SENIORITY LIST OF THE YEAR 2019
BY PLACING THE APPELLANT SENIOR TO MST: NIGAR
AKHTAR IN THE SENIORITY LIST AND AS AND WHEN THE
RESPONDENTS PLEASED TO PROMOTE THE OFFICERS, THE
UNDERSIGNED MAY BE CONSIDERED SENIOR TO MST: NIGAR

AKHTAR.

Respectfully Sheweth:

1. That the appellant has been appointed as P.E.T BPS-09 by Divisional
Director of Education, Kohat Division vide appointment order dated:
02/10/1995.

(Copy of order is attached as "A")

2. That due to her hard work and diligence toward her official duties, the appellant has been promoted step by step under the prevailing rules and regulations and finally promoted to the post of SIPE (BPS-18) and presently working in the same post.

(Copy of notification is attached as "B")

3. That during her entire service in Education Department, the appellant tried her best to become fully acquainted with the modern education techniques and for this purpose, she attended all compulsory trainings and courses in time, not only for the purpose of promotion but to impart standard education to the students also.

4. That the Education Department vide notification No.SO(S)6-2/90/1 dated: 18/10/1994 laid down the method of recruitment, qualification and other condition as well as the promotion criteria as well.

(Copy of notification is attached as "C")

5. That the Education Department vide Notification No.SO(S)6-2/98/service rules dated: 15/01/1999 made further amendments in Notification No.SO(S)6-2/90/1 dated: 18/10/1994 and since 1999 the subsequently amended notification shall have to be followed.

(Copy of notification is attached as "D")

6. That the Education Department by following the same promotion criteria as mentioned in Notification dated: 15/01/1999 prepared various seniority lists on annual basis as per their requirement. Here the appellant annexed only two seniority lists of the year 2004 and 2006 for ready reference.

(Copy of seniority lists are annexed as "E" & "F")

7. That by following the amended criteria for promotion as referred in Notification dated: 15/01/1999, the following formulas shall be adopted for reckoning the seniority position of the official and the same is reflected in the 2006 seniority list.

SENIORITY RECKONING FORMULA FROM DPE POST TO SDPE POST

- a. *If SDPE degree was obtained before 1st appointment, the seniority shall be reckoned from date of 1st appointment.*
- b. *If the SDPE degree was obtained after 1st appointment, the seniority of the officer shall be reckoned from the declaration of result of SDPE.*
- c. *If the date of declaration of result of SDPE of the officers were same, the seniority of the officer shall be reckoned from the date of 1st appointment.*
- d. *If the date of 1st appointment of the officers were same, the seniority of the officer shall be reckoned from the date of birth.*

8. That despite the clear rules are available for reckoning the seniority position but the appellant was shocked while seeing the tentative seniority list where she was placed at serial No.22 after Mst: Nigar Akhtar. Although, the appellant passed SDPE examination on 16/07/10995 where as Mst: Nigar Akhtar passed her SDPE examination in 1996. Therefore, she should have been considered junior to the appellant under the amended rules.

(Copy of tentative seniority list is attached as "G")

9. That the appellant soon after getting knowledge of such discrimination and violation of rules, made objection on the tentative list and requested the concerned officers for making correction.

(Copy of application is attached as "H")

10. That the appellant once again shocked where the Education Department issued a final seniority list vide letter No.64/A-25/SIPE(F) seniority list dated: 27/04/2020 and she was again placed junior to Mst: Nigar Akhtar which is gross violation of the available rules as well as discrimination with the appellant.

(Copy of final seniority list is attached as "I")

11. That the appellant was aggrieved from the impugned seniority list issue by the Education Department as the same is illegal and violation of the prevailing rules as well as discrimination with the applicant.

12. That as the appellant request was not positively entertained and no correction was made by the concerned officers, therefore, the appellant filed a departmental appeal before the competent authority bearing Diary No.2228 dated: 18/05/2020.

(Copy of Departmental Appeal is attached as "J")

13. That soon after receiving the appeal, the appellant come to know that the respondents with mala-fide intention going to conduct another PSB meeting for the promotion of the officers at the analogy of the old formula without rectifying the previous impugned seniority list due to this reason the respondents has not given any reply of the departmental appeal even after lapse of statutory period.
14. That the appellant is aggrieved from the impugned final seniority list 2019 issued by the respondents and from the attitude of the respondent being not entertaing the departmental appeal had no other adequate remedy/speedy justice but to file the instant service appeal on the following grounds inter-alia: -

Grounds:

- A. That act of the respondents is illegal, against law, facts and natural justice, hence cannot be sustained in the eye of law.
- B. That the respondents had not performed their duties according to the law and have illegally ignored the appellant's seniority by placing the junior officers from the appellant.
- C. That it is the violation of natural justice hence needs interference of this August Court.
- D. That it is against the ends of justice and gross violation of the government enacted laws and rules legislated for the purpose of giving facilities to the Government servants and also infringement of Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion & Transfer) Rules 1989.
- E. That the respondents have not treated the appellant in accordance with law and rules on the subject and violate the Article.4 of the Constitution of Pakistan 1973.

- F. That the respondents mala-fidely deprived the appellant from promotion being placed junior from the already junior officer Mst: Nigar Akhtar. As she completed her mandatory course later than the appellant.
- G. That other grounds if any will be raised at the time of arguments with prior permission of this Hon'ble court.

IT IS THEREFORE, PRAYED THAT ON ACCEPTANCE OF THIS SERVICE APPEAL AN APPROPRIATE ORDER/DIRECTION TO THE RESPONDENTS MAY BE ISSUED FOR MAKING CORRECTION IN THE IMPUGNED FINAL SENIORITY LIST OF THE YEAR 2019 BY PLACING THE APPELLANT SENIOR TO MST: NIGAR AKHTAR IN THE SENIORITY LIST AND AS AND WHEN THE RESPONDENTS PLEASED TO PROMOTE THE OFFICERS, THE UNDERSIGNED MAY BE CONSIDERED SENIOR TO MST: NIGAR AKHTAR.

ANY OTHER REMEDY IF THIS HON'BLE COURT DEEMS FIT MAY GRACIOUSLY BE AWARDED.

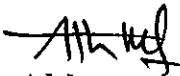
INTERIM RELIEF:

It is further requested that in the meanwhile, the Hon'ble court may issue direction to the respondents not to issue any promotion order/notification of the officer from impugned seniority list till final disposal of the service appeal.

APPELLANT

Dated: 18-8-20

Through


Athar Abbas
Advocates High Court,
Peshawar

**BEFORE THE HON'BLE CHAIRMAN KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR**

In Ref.
S.A _____/2020

YAHYA BEGUM

APPELLANT

VERSUS

GOVT: OF KHYBER PAKHTUNKHWA, THROUGH CHIEF
SECRETARY AND OTHERS

RESPONDENTS

AFFIDAVIT

I, Mr. Muhammad Naeem S/O Khan Wali R/O University Town Peshawar, and (Attorney for Appellant "Yahya Begum" do hereby solemnly affirm and declare that the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Yahya Begum

DEPONENT

Dated: 18-8-2020

NIC No. 14203-1986861-6
Mobile No. —

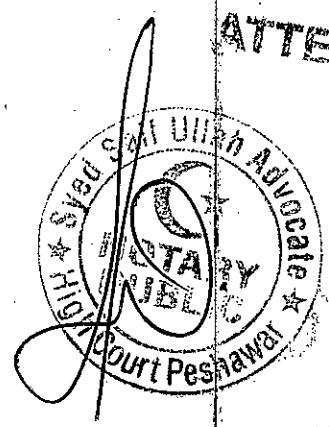
Identified by:

Athar Abbas

Athar Abbas

Advocate High Court Peshawar

ATTESTED



19 AUG 2020

**BEFORE THE HON'BLE CHAIRMAN KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR**

In Ref.
S.A _____/2020

YAHYA BEGUM

APPELLANT

VERSUS

GOVT: OF KHYBER PAKHTUNKHWA, THROUGH CHIEF
SECRETARY AND OTHERS

RESPONDENTS

ADDRESSES OF PARTIES

APPELLANT

YAHYA BEGUM W/O MUHAMMAD NAEEM R/O UNIVERSITY
TOWN PESHAWAR.

RESPONDENTS

1. GOVT: OF KHYBER PAKHTUNKHWA THROUGH CHIEF
SECRETARY, CIVIL SECRETARIAT PESHAWAR.
2. SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION, PESHAWAR.
3. DIRECTOR, DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION, PESHAWAR.

APPELLANT

Dated: 18-8-2020

Through

**Athar Abbas
Advocates High Court,
Peshawar**

8

Annexure - A

BETTER COPY of
appointment order

OFFICE OF THE DIVISIONAL DIRECTOR OF EDUCATION KOHAT DIVN. KOHAT


Appointment

On the recommendation of the departmental selection committee, the appointments of the following P.E.T. (Female) Candidates are hereby ordered against the vacant P.E.T post moted against each in BPS-9 (fixed) plus usual allowances with effect from the dates of taking over charge: -

S/No.	Name/Father Name/Address	Posted at	Remarks
1.	Tabbasum Akhtar FA D/O Spin Badshah R/o latamber (Karak)	G.G.M.S Thall (Kohat)	Against the vacant post
2.	Zubaida FA D/O Maizullah Khan r/o Chowkara (Karak)	G.G.M.S Jandri Biland Khel	-do-
3.	Nusrat Bano D/O Muhamamd Sharif r/o Shakardarra (Kohat)	G.G.M.S Bori Saghri.	-do-
4.	Ifat Bibi FA D/O Abdul Fateh r//o Chorlaki (Kohat)	G.G.M.S Chorlaki	-do-
5.	Dil-i-Khursheed MA D/O Mohammad Ali R/o Karak	G.G.M.S Kiri Shoikhan (Kohat)	-do-
6.	Rashida Begum FA D/O Amin Gul R/o Khattak Colony Kohat.	G.G.M.S Hassan Khel Kohat (Zachai)	-do-
7.	Kausar Shabana MA D/O Abdul Sadiq R/o Karak.	G.G.M.S Ziarat Sheikh Allah Dad (Kohat)	-do-
8.	Yahya Begum D/o Gul Nawaz r/o Chewkara (karak)	G.G.M.S Darsamand Kohat	-do-
9.	Taslim Bibi BA D/O r/o Charbagh, Jangle khel kohat	G.G.M.S Kardu khel (Kohat)	-do-
10.	Farida Nawab D/O Noor Nawab r/o chowkara (karak)	G.G.M.S Sabir Abad (Karak)	-do-

Terms and conditions.

1. Their appointments are made purely on temporary basis and liable to termination at any time without giving reasons/notice.
2. In case of resignation they will have to submit one month's prior notice to the department or forfeit one month's pay in lieu thereof to the government.
3. They are required to produce their Health and Age certificates from the Medical Authority concerned, before taking over charge provided that they are government service.
4. They should not be allowed to take over charge, if their age is less than 18 years or above 40 years.
5. Their appointment is subject to the further condition that they are domiciled of Kohat Division.
6. All Educational, character and domicile certification should be thoroughly checked before taking over charge and if necessary it should be verified from the


ATTESTED

OFFICE OF THE DIVISIONAL DIRECTOR OF EDUCATION (S) KOHAT DIVN. KOHAT.
APPOINTMENT.

On the recommendation of the Departmental Selection Committee, the appointments of the following P.B.T. (Female) Candidates are hereby ordered against the vacant P.B.T. post noted against each in BPS-9 (fixed) plus usual allowances with effect from the dates of taking over charge:-

S/No	Name/Father's Name/Address	Posted at	REMARKS
1.	Tabbasum Akter FA D/O Spin Bad Chah r/o Latombor (Karak).	G.G.M.S. Thal (Kohat).	Against the vacant Post
2.	Zubaida FA D/O Maizullah Khan r/o Chowkara (Karak).	G.G.M.S. Jandri Biland Khel	do
3.	Musrat Bano D/O Muhammad Sharif, r/o Shakardarra (Kohat).	G.G.M.S. Bori Saghri.	do
4.	Ifat Bibi FA D/O Abdul Patah r/o Chorlaki (Kohat).	G.G.M.S. Chorlaki	do
5.	Dil-i-Khursheed MA D/O Mohammad A. Ali r/o Karak.	G.G.M.S. Kiri Sheikhan (Kohat).	do
6.	Rashida Begum FA D/O Amin Gul r/o Khattak Colony Kohat.	G.G.M.S. Jandri Khel Kohat. (Kachal).	do
7.	Kausar Shabana MA D/O Abdul Sadiq r/o Karak.	G.G.M.S. Ziarat, Shaikha Allah Dad (Kohat).	do
8.	Mehya Begum D/O Gul Nawaz, r/o Chowkara (Karak).	G.G.M.S. Darsamand Kohat.	do
9.	Taslim Bibi FA D/O Kamran r/o Charbagh, Jangla Khel Kohat.	G.G.M.S. Mardu Khel (Kohat).	do
10.	Farida Nawab D/O Noor Nawab r/o Chowkara (Karak).	G.G.M.S. Sabir Abad (Kohat).	do

TERMS AND CONDITIONS.

1. Their appointments are made purely on temporary basis and liable to termination at any time without assigning reasons/notice.
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5. Their appointment is subject to the further condition that they are domiciled of Kohat Division.
6. All Educational, Character and Domicile Certificate should be thoroughly checked before taking over charge and if necessary it should be verified from the concerned authorities.

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ATTESTED

9-05

- 8. Charge reports should be sent to all concerned.
- 9. No TA/DA etc is allowed to any one.

(HAJI ABDUL QAYUM KHAN),
 DISTRICT DIRECTOR OF EDUCATION (SCHOOLS),
 KOHAT DIVISION, KOHAT.

Enst No 9475 - 96 /P.D.C(F)/VI-B Dated Kohat the 02-10-1995

Copy forwarded to the:-

- 1-2 District Education Officer (Female) Secy: Kohat and Karak.
- 3-12: Principal/Headmistress of concerned girls High/Middle Schools.
- 13-22: Candidates concerned.

/ASMAT BANGASH/*

[Signature] DDW,
 For Divl: Director of Education,
 (Schools), Kohat Division, Kohat.

[Signature]
ATTESTED
 to be a true copy

[Signature]
ATTESTED



(B)

10

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone: 091-9210480, Fax # 091-9211419

Dated Peshawar the May 28th, 2018

NOTIFICATION

NO. SO(S/F)E&SED/1-3/2018/PSB/Promotion/BS-17/BS-18/SIPE: Consequent upon approval of the Competent Authority (Chief Minister Khyber Pakhtunkhwa) posting/ transfer/ adjustment in respect of the following Female Instructor Physical Education (BS-17) promoted to Senior Instructor Physical Education (BS-18) vide this department notification of even No. dated 23-05-2018 are hereby ordered in the interest of public service with immediate effect:

S#	Name/Designation	Place of posting	Remarks
1	MST. NAGHMA AKBAR, SIPE-BS-18 GGHSS Qamar Zaman Mandew Bannu.	SIPE-BS-18 GGHSS Kakki Bannu	A.V.P
2	MST. SAMINA HABIB, SIPE-BS-18 GGHSS Bilitang Kohat	SIPE-BS-18 GGHSS Bilitang Kohat	Already occupied by her
3	MST. DILSHAD BEGUM, SIPE-BS-18 GGHSS No.2 Bannu City	SIPE-BS-18 GGHSS Nar Shukrutlah Bannu	She will actualize her promotion in BS-18 and join the post of (CIPE BS-19) at GGHSS Ghoriwala Bannu in her own pay and scale
4	MST. SAFINA BABAR, SIPE-BS-18 GGHSS: BSD Peshawar working against Lib: Post	SIPE-BS-18 GGHSS Harichand Charsadda	She will actualize her promotion in BS-18 and join the post of (CIPE BS-19) at GGHSS University Town Peshawar in her own pay and scale
5	MST. SHAHEEN ANWAR, SIPE-BS- 18 Govt: Comprehensive HSS Abbottabad.	SIPE-BS-18 GGHSS Lora Abbottabad	A.V.P
6	MST. REHANA PARVEEN, SIPE- BS-18 GGHSS Prova DI Khan	SIPE-BS-18 GGHSS Prova DI Khan	Already occupied by her
7	MST. SHAHIDA BEGUM, SIPE-BS- 18 GGHSS Nowshera Kalan.	SIPE-BS-18 GGHSS Nowshera Kalan	Already occupied by her
8	MST. SHABNAM JADOON, SIPE-BS-18 GGHSS Dhamtour Abbottabad	SIPE-BS-18 GGHSS Dhamtour Abbottabad	Already occupied by her
9	MST. TAMSILA NAZ, SIPE-BS-18 R.I.T.E (Female) D.I Khan	SIPE-BS-18 GGHSS Kabal Swat	She will actualize her promotion in BS-18 at GGHSS Kabal Swat and rejoin the post of (CIPE BS-19) at R.I.T.E (Female) D.I Khan in her own pay and scale
10	MST. NAUREEN ANWAR, SIPE-BS-18 R.I.T.E (Female) Peshawar.	SIPE-BS-18 GGHSS Gumbat Kohat	She will actualize her promotion in BS-18 and rejoin the post of (CIPE BS-19) at R.I.T.E (Female) Peshawar in her own pay and scale
11	MST. SAEEDA BEGUM, SIPE-BS-18 GGHSS Chamkani Peshawar	SIPE-BS-18 GGHSS Chamkani Peshawar	Already occupied by her
12	MST. MISBAH SEEMA, SIPE-BS-18 GGHSS Chah Said Munawar Shah No. 6 DIKhan	SIPE-BS-18 GGHSS Chah Said Munawar Shah No. 6 DIKhan	Already occupied by her
13	MST. RAHILA BANO, SIPE-BS-18 GGHSS No.5 Qasaban DIKhan	SIPE-BS-18 GGHSS Charbagh Swat	She will actualize her promotion in BS-18 and rejoin the post of (CIPE BS-19) GGHSS No.5 Qasaban DI Khan in her own pay and scale

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14	MST. RAFIA KHATTAK, SIPE-BS-18 GGHSS Khyber Colony Peshawar against SS post	SIPE-BS-18 GGHSS Hayatabad Peshawar	Vice Sr. No: 67
15	MST. HAMIDA BAGEM, SIPE-BS-18 GGHSS No. 9 Din Pur D.I Khan	SIPE-BS-18 GGHSS No. 9 Din Pur D.I Khan	Already occupied by her
16	MST. ABIDA PARVEEN, SIPE-BS-18 GGHSS Malakpura Abbottabad	SIPE-BS-18 GGHSS Malakpura Abbottabad BS-18	Already occupied by her
17	MST. ROBINA SHAHEEN, SIPE-BS-18 GGHSS Sikandar Khel Bala Bannu.	SIPE-BS-18 GGHSS Sikandar Khel Bala Bannu	Already occupied by her
18	MST. NABILA TABASUM, SIPE-BS-18 GGHSS No.2 Peshawar Cantt.	SIPE-BS-18 GGHSS Lahor-Swabi	She will actualize her promotion in BS-18 and rejoin the post of (CIPE BS-19) at GGHSS No.2 Peshawar Cantt in her own pay and scale
19	MST. PARVEEN AKHTAR, SIPE-BS-18 GGHSS Akora Khattak Nowshera	SIPE-BS-18 GGHSS Akora Khattak Nowshera	Already occupied by her (On acting charge basis)
20	MST. DANISH BEGUM, SIPE-BS-18 GGHSS Shah Dhand Mardan	SIPE-BS-18 GGHSS Shah Dhand Mardan	Already occupied by her
21	MST. SUGHRA AFANDI, SIPE-BS-18 GGHSS Rustam Khel Mardan BS-17.	SIPE-BS-18 GGHSS Baghicha Dheri Mardan	A.V.P
22	MST. NIGAR AKHTAR, SIPE-BS-18 GGHSS Nowshera Cantt.	SIPE-BS-18 GGHSS Shaidu Nowshera	A.V.P
23	MST. YAHYA BEGUM, SIPE-BS-18 GG Comprehensive HSS Peshawar City	SIPE-BS-18 GGHSS Mandani Charsadda	She will actualize her promotion in BS-18 and rejoin the post of (CIPE BS-19) at Govt Girls Comprehensive HSS Peshawar City in her own pay and scale (On acting charge basis)
24	MST. REHANA KHATOON, SIPE-BS-18 GGHSS Chokara Karak	SIPE-BS-18 GGHSS Chokara Karak	Already occupied by her
25	MST. NAHEED GOHAR, SIPE-BS-18 GGHSS Babri Banda Kohat	SIPE-BS-18 GGHSS Babri Banda Kohat	Already occupied by her
26	MST. MUFEEDA BEGUM, SIPE-BS-18 GGHSS; Shahbaz Garhi Mardan	SIPE-BS-18 GGHSS; Shahbaz Garhi Mardan	Already occupied by her (On acting charge basis)
27	MST. SAMINA AKHTAR, SIPE-BS-18 GGHSS Pir Pai Nowshera	SIPE-BS-18 GGHSS Pir Pai Nowshera	Already occupied by her (On acting charge basis)
28	MST. ASMA QUARSHI, SIPE-BS-18 GGHSS Lady Grifh Peshawar	SIPE-BS-18 GGHSS Lady Grifh Peshawar	Already occupied by her
29	MST. MUNAZA JABEEN, SIPE-BS-18 GGHSS Tarnab Peshawar	SIPE-BS-18 GGHSS Tarnab Peshawar	Already occupied by her
30	MST. AZRA NAZ, SIPE-BS-18 GGHSS Toru Mardan	SIPE-BS-18 GGHSS Toru Mardan	Already occupied by her
31	MST. GHAZALA NAEEM SIPE BS-18 GGHSS Behzadi Chakarkot Kohat	SIPE-BS-18 GGHSS Behzadi Chakarkot Kohat	Already occupied by her
32	MST. SUJHAT BEGUM, SIPE-BS-18 GGHSS Takhtbhai Mardan	SIPE-BS-18 GGHSS Takhtbhai Mardan BS-18	Already occupied by her

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54	MST. HASSAN BASRI, SIPE-BS-18 GGHSS Sufaid Sung Peshawar.	SIPE-BS-18 GGHSS Landi Arbab Peshawar	Vice Sr.No. 64
55	MST. SAIRA ILTAF, SIPE-BS-18 GGHSS Kakul Abbottabad	SIPE-BS-18 GGHSS Kakul Abbottabad	Already occupied by her
56	MST. SAJIDA NOUSHEEN, SIPE-BS-18 GGHSS Begum. Shahabuddin Peshawar	SIPE-BS-18 GGHSS Begum Shahabuddin Peshawar	Already occupied by her
57	MST. NAZMA SHAHEEN, SIPE-BS-18 GGHSS Larama Peshawar	SIPE-BS-18 GGHSS Larama Peshawar	Already occupied by her (On acting charge basis)
58	MST. ROBINA SHAHEEN, SIPE-BS-18 GGHSS Rashakai Nowshera	SIPE-BS-18 GGHSS Rashakai Nowshera	Already occupied by her
59	MST. RIFFAT SHAHEEN, SIPE-BS-18 GGHSS Baffa Manshra	SIPE-BS-18 GGHSS Baffa Manshra	Already occupied by her
60	MST. ARIFA SALEEM, SIPE-BS-18 GGHSS University Town Peshawar	SIPE-BS-18 GGHSS Nishtar Abad Peshawar	Vice S.No. 66
CONSEQUENTIAL TRANSFER			
S#	Name/Designation	Proposed place of posting	Remarks
61	Shabana Taj IPE BS-17 Working against BS-18 at GGHSS Havelian Abbottabad	IPE BS-17 GGHSS Richbhen Abbottabad	A.V.P.
62	Nighat Bibi IPE BS-17 Working against BS-18 at GGHSS Panian Haripur	IPE BS-17 GGHSS Bandi Muneem Haripur	A.V.P.
63	Nazma Bibi IPE BS-17 Working against BS-18 at GGHSS Hattar Haripur	IPE BS-17 GGHSS Khanpur Haripur	A.V.P.
64	Shakeela Begum IPE BS-17 Working against BS-18 at GGHSS Landi Arbab Peshawar	IPE BS-17 GGHSS Sufaid Sung Peshawar	A.V.P.
65	Irum Shafi IPE BS-17 Working against BS-18 at GGHSS Mathra Peshawar	SIPE BS-17 GGHSS Pabbi Nowshera (In her own pay and scale)	A.V.P.
66	Nabila Durrani IPE BS-17 Working against BS-18 at GGHSS Nishtar Abad Peshawar	SIPE BS-17 GGHSS Akbar Pura Nowshera (In her own pay and scale)	A.V.P.
67	Shahnaz Akhtar IPE Working against BS-18 at GGHSS Hayatabad Peshawar	IPE BS-17 Govt Elementary College (Female) Khyber Agency (In her own pay and scale)	A.V.P.
68	Hameeda Bibi IPE BS-17 Working against BS-18 at GGHSS Kabal Swat	IPE BS-17 GGHSS Tahirabad Swat	A.V.P.
69	Sofia Kalsoom IPE BS-17 Working against BS-19 at R.I.T.E (Female) Bannu	IPE BS-17 GGHSS Nar Jaffar Bannu	A.V.P.
70	Robina Iqbal IPE BS-17 GGHSS Teri Karak	IPE BS-17 GGHSS Gamar Zaman Mandew Bannu	Vice Sr No. 48. She will report back to GGHSS Teri Karak as IPE BS-17 against the post of SIPE BS-18 in her own pay and scale after actualization of promotion by MST. Sardar Bibi SIPE BS-18 at Sr. No. 48

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2. No TA/ DA allowed.

SECRETARY

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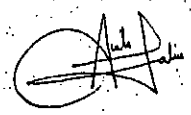
Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director DCTE, Khyber Pakhtunkhwa, Abbottabad.
4. District Education Officers (Female) concerned.
5. District Accounts Officers concerned.
6. In charge EMIS, E&SE Department for uploading at official website.
7. PS to Principal Secretary to Chief Minister, Khyber Pakhtunkhwa, Peshawar.

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- 8. PS to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 9. PS to Minister E&SE, Khyber Pakhtunkhwa, Peshawar.
- 10. PS to Secretary E&SE Department.
- 11. Senior Instructor Physical Education concerned.
- 12. Office order file.



(ANEELA FAHIM)
SECTION OFFICER (SCHOOLS FEMALE)



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REGISTERED NO. PIII

GAZETTE

KHYBER PAKHTUNKHWA

Published by Authority

PESHAWAR, FRIDAY, 23RD FEBRUARY, 2018

GOVERNMENT OF N.W.F.P
EDUCATION DEPARTMENT

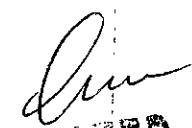
NOTIFICATION
Dated 18th October, 1994

No. SO (S)6-2/90/1. In pursuance of the Provisions contained in sub-rule (2) of rule 3 of the North West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Education Department in consultation with the Services & General Administration Department and the Finance Department, hereby lays down the method of recruitment, qualification and other conditions specified in column 3 to 6 of the Appendix to this Notification which shall be applicable to posts specified in column 2 of the said Appendix.

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APPENDIX

S#	Nomenclature of post	Minimum Qualification for appointment by initial recruitment or by transfer	Minimum for appointment by promotion	Age limit	Method of recruitment
1	2	3	4	5	6
1.	Principal Government college of Physical Education (BS-18)	By Promotion on the basis of seniority-cum-fitness from amongst the Assistant Directors Physical Education and Sports and lecturers Government College of Physical Education having seven years' service in the respective sections.
2.	Assistant Director Physical Education and Sports/Lecturers Govt College of Physical Education. (BS-17)	M.Sc in Physical Education from a recognized University.	Male 21-30 Years Female 21-40 Years	a) Eighty five percent by Promotion on the basis of seniority-cum-fitness from amongst Directors Physical Education Government Higher Secondary Schools/Elementary Colleges and Assistant Distt: Education Officer (Physical) having five years' service as such and b) Fifteen percent by initial recruitment.
3.	Director Physical Education Govt: Higher Secondary Schools/Elementary Colleges and Assistant Distt: Education Officer (Physical) (BS-16)	B. A/B. Sc from a recognized university with Senior Diploma in Physical Education from a recognized college.	Male 21-30 Years Female 21-40 Years	a) Sixty percent by Promotion, on the basis of seniority-cum-fitness from amongst the Physical Supervisors with two years' service as such and b) Forty percent by initial recruitment.
4.	Physical Supervisor (BS-15)	B. A/B. Sc from a recognized university with Senior Diploma in Physical Education.	Male 18-30 Years Female 18-40 Years	a) Fifty percent by Promotion on the basis of seniority-cum-fitness from amongst the Physical Education Teachers with senior Diploma in Physical Education and having five years' service as such and b) Fifty percent by initial recruitment.
5.	Physical Education Teacher (BS-9)	F. A/F. Sc with junior Diploma in Physical Education/Certificate of training in phy; Education from TAKYA TRAINING CENTRE.	Male 21-30 Years Female 21-40 Years	By initial recruitment

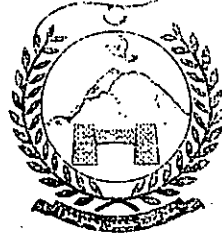
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EXTRAORDINARY
GOVERNMENT



REGISTERED NO. PIII

GAZETTE

KHYBER PAKHTUNKHWA

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PESHAWAR, FRIDAY, 23RD FEBRUARY, 2018

GOVERNMENT OF NORTH-WEST FRONTIER PROVINCE
EDUCATION DEPARTMENT

NOTIFICATION

Peshawar, dated the 15-01-1999.

No. SO (S)6-2/98/Services Rules.— In pursuance of the Provisions contained in sub-rule (2) of rule 3 of the North West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the Education Department in consultation with the Services and General Administration Department and the Finance Department, hereby directs that in this Department Notification No. SO (S)6-2/90/1, dt. 18th October, 1994, the following further amendment shall be made, namely: -

AMENDMENT.

In the appendix-

- i. For the existing entries in column No. 5, against serial No. 3 the following shall be substituted, namely:

" MALE"
"21-35 YEARS"

- ii. for the existing entries in column No. 5 against serial No. 5 the following shall be respectively substituted, namely:

<u>MALE</u>	<u>Female</u>
21-33 Years	21-40 Years"

- iii. for the existing entries in column No. 6, against serial No. 3, the following shall be substituted, namely:

- " (a) forty percent by initial recruitment; and
(b) sixty percent by promotion from amongst in-service teachers (PTC/CTM/PT/AT etc) and Physical Supervisor of the Education Department having the prescribed qualification on the basis of batch-wise/year-wise merit",

- iv. for the existing entries in column No. 6, against serial No. 5, the following shall be substituted, namely:

"By initial recruitment: provided that seventy five percent of vacancies shall be filled on batch-wise/year-wise merit and twenty five percent on the basis of open merit competition.

Note: Candidates competing for the post shall be subjected to a Screening Test and only those who qualify the Screening Test shall be eligible to appear in the interview for selection against the post".

SECRETARY TO GOVT OF NWFP
EDUCATION DEPARTMENT

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Annexure - E

17

SENIORITY LIST OF ALL CATEGORIES OF TEACHERS AND PHYSICAL SUPERVISOR (Female) FOR PROMOTION TO THE POST OF DPE/ADO (SPORTS) BPS-16 REGULAR ON THE BASIS OF YEAR WISE/BATCH WISE MERIT (N.W.F.P./F.A.T.A) CORRECTED UPTO 1.4.2004.

No	Name of Teachers	Designation	School	Date of Birth/Domicile	Date of 1st Appointment	Date of passing SDPE Exams	Date of appointment in Education Department/Date of passing SDPE Exams	Remarks
1	Miss Kishwar Sulatan	PET	GGMS, Kotla Saiddaen D.I.K	22.1.67/D.I.K	24.5.92	23.6.90	24.5.92	
2	Miss Saddaf Saeed	PET	GGHS, Navella D.I.K	6.1.71/Bannu	1.7.97	7.10.96	1.7.97	
3	Miss Fakhri Anjum	PET	GGMS, Bara Banda N.S.R	13.4.77/N.S.R	14.12.99	29.12.98	14.12.99	
4	Miss Naheed Gohar	PET	GGHS, Billi Tang Kchat	4.3.69/Mansehra	17.3.93	11.12.2000	11.12.2000	
5	Miss Mufida Begum	PET	GGHS, Doobian Swabi	31.8.71/Swabi	11.12.90	3.5.2001	3.5.2001	
6	Miss Mussarat Shaheen	PET	GGHSS, Baffa Mansehra	1.6.59/Mansehra	30.5.93	3.5.2001	3.5.2001	
7	Miss Sajida Sufi	PET	City Degree. College Peshawar	20.4.53/Pesh	9.9.76	1.6.2001	1.6.2001	
8	Miss Sharneena Akhter	PET	GGPS, Shibli Banda Karak	15.3.74/Karak	16.5.92	11.6.2002	11.6.2002	
9	Miss Shabnam Raza Malik	PET	GGHS, Hangu	3.9.69/Pesh:	1.3.93	15.11.2002	15.11.2002	
10	Miss Asma Qurashi	PET	GGMS Shah Alam M. Agency	6.6.76 / Pesh:	20.1.95	2.1.2003	2.1.2003	
11	Miss. Munaza Jabeen	PET	GGMS Shno Ghundai M. Agency	10.10.75 / Pesh:	22.11.95	28.7.2003	28.7.2003	
12	Miss Azra Naz	TT	GGMS Sokai Mardan.	1.2.70 / Mardan	8.3.98	28.7.2003	28.7.2003	
13	Miss Ghazal Naeem	PET	GGMS Khar Matoo Kohat	15.2.68 / Kohat	1.8.88	4.10.2003	4.10.2003	
14	Shujaat Begum	PET		05-09-1972	01-09-96	19-03-04	19-03-04	

M. Mandan
 Asstt: Director (Sports/T.S)
 Directorate of Schools & Literacy
 N.W.F.P, Peshawar.

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(18) 2006 "F"

OFFICE OF THE DIRECTOR SCHOOLS AND LITERACY N.W.F.P.; PESHAWAR.

SENIORITY/MERIT LIST OF INSERVICE WILLING TEACHERS(FEMALE)IN NWFP,HAVING THE QUALIFICATION OF BA/BSC.PLUS SDPE/FO
PURPOSE OF PROMOTION TO DPE POST B-16 CORRECTED UPTO 30.5.2006.

S.NO.	NAME/DESIGNATION OF THE TEACHER	SCHOOL ADDRESS	DATE OF BIRTH/DOMICILE	D/O IST APPTT;	D/O PASSING SDPE EXAM	SENIORITY POSITION	REMARK
1	2	3	4	5	6	7	8
1	Fakhri Anjum PET	GGMS Bara Banda Nowshera	13.4.77/Nowshera	14.12.99	29.12.98	14.12.99	
2	Shahana Tamkanat PET	GGCMHS Lakki Marwat	17.11.68/Lakki.	1.10.89	11.12.2000	11.12.2000	
3	Nighat Seema PET	GGHSS Hayatabad Peshawar	5.11.70/Peshawar	13.1.93	11.12.2000	11.12.2000	
4	Maryam Rasool PET	GGCMHS Haripur	7.1.70/Haripur	1.9.93	11.6.2002	11.6.2002	
5	Saeeda Gul PET	GGMS Civil Colony Miranshah NWA	27.4.75/NWA	25.4.96	12.12.2003	12.12.2003	
6	Shaheen Ali CT	JICA M/S Lahor Swabi	12.12.78/Swabi	1.4.2004	12.12.2003	1.4.2004	
7	Gul Dari PET	GGMS Mianki Banda Karak	5.1.62/Karak	8.11.79	14.7.2004	14.7.2004	
8	Mussarij Iqbal PET	GGHS Bogara karak	8.1.70/Karak	13.11.90	14.7.2004	14.7.2004	
9	Sardar Bibi PET	GGHS Jehangiri karak	30.5.70/Karak	1.12.94	14.7.2004	14.7.2004	
10	Sheeraz Taj BM	GGMS Katta Khat Mardan	9.11.76/Mardan	3.1.96	14.7.2004	14.7.2004	
11	Afsheen Mumtaz PET	GGMS Mohmand Abad Peshawar	23.11.74/Peshawar	20.11.94	12.10.2004	12.10.2004	
12	Sadia Hazrat PET	GGHS Munjai Dir Lower	05.3.83/Dir Lower	02.12.04	21.10.04	2.12.04	
13	Shahida Begum PET	GGHSS Dabb karak	15.12.76/Karak	13.11.2000	15.12.2004	15.12.2004	
14	Rehana Yasmeen PET	GGMS Zaryab Colony Peshawar	30.4.71/Peshawar	5.12.94	20.5.2005	20.5.2005	
15	Hassan Basri PET	GGMS No.2 Gul Bahar Peshawar	9.7.72/Peshawar	10.7.97	20.5.2005	20.5.2005	
16	Saira Altaf PET	GGMS No.2 Gul Bahar Peshawar	1.1.81/Abbottabad	24.6.2005	26.7.2004	24.6.2005	
17	Tasleem Begum PET	GGHS Sajji kot Abbottabad	11.11.60/Malakand	5.12.84	30.5.2006	30.5.2006	
18	Nazima Shaheen TT	GGHS, Dargai Malakand	3.5.77/Peshawar	2.11.96	30.5.2006	30.5.2006	

19 Dil Gyoz PET

GGMS Kukar Peshawar

GGMS Kukar Peshawar
01/06/07

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30.5.06 30.5.06
M. Inam
Assistant Director (Sports)
Directorate of Schools & Literacy
NWFP Peshawar

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Tentative List

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**TENTATIVE SENIORITY LIST OF SENIOR INSTRUCTOR PHYSICAL EDUCATION BS-18 (FEMALE) ELEMENTARY AND SECONDARY EDUCATION
DEPARTMENT KHYBER PAKHTUNKHWA CORRECTED UPTO 14/04/2019**

S.No	Name of Officer with Academic Qualification	Domicile	Date of Birth	D/O Ist Entry Into Govt Service	D/O Apptt: as DPE BS-16 (Regular)	D/O Award of BS-17 (Regular)	Regular Appl/Promotion to the present post			Place of Posting
							D/O Award of BS-18 (Regular)	BPS	Method or recruitment	
1	2	3	4	5	6	7	8	9	10	11
1	MST. SAMINA HABIB MSC (HPE)	KOHAT	01.05.1960	01.09.1981	23.02.1988	15.06.2009	23.05.2018	18	By promotion	GGHSS Biliang Kohat
2	MST. DILSHAD BEGUM MSC (HPE)	PESHAWAR	28.08.1960	27.05.1979	20.08.1990	19.05.2009	23.05.2018	18	By promotion	GGHSS Ghoriwala Bannu.
3	MST. SAFINA BABAR MSC (HPE)	NOWSHERA	06.01.1962	26.08.1990	26.08.1990	19.05.2009	23.05.2018	18	By promotion	GGHSS University Town Peshawar
4	MST. SHAHEEN ANWAR MSC (HPE)	ABBOTTABAD	03.06.1963	24.07.1991	24.07.1991	19.05.2009	23.05.2018	18	By promotion	Govt Comprehensive HSS Abbottabad
5	MST. REHANA PARVEEN MSC (HPE)	D.I. KHAN	10.02.1963	24.07.1991	24.07.1991	19.05.2009	23.05.2018	18	By promotion	GGHSS Prova DI Khan
6	MST. SHAIIDA BEGUM MSC (HPE)	NOWSHERA	01.09.1967	07.01.1990	16.05.1997	19.05.2009	23.05.2018	18	By promotion	GGHSS Nowshera Kalan.
7	MST. SHABNAM JADOON MSC (HPE)	ABBOTTABAD	05.04.1968	16.05.1997	16.05.1997	19.05.2009	23.05.2018	18	By promotion	GGHSS Dhamtour Abbottabad
8	MST. TAMSELLA NAZ MSC (HPE)	D.I. KHAN	31.08.1967	06.03.1990	16.05.1997	19.05.2009	23.05.2018	18	By promotion	R.I.T.E (F) D.I Khan
9	MST. NAUREEN ANWAR MSC (HPE)	KOHAT	03.05.1968	16.05.1997	16.05.1997	19.05.2009	23.05.2018	18	By promotion	RITE (F) Peshawar.
10	MST. SAEEDA BEGUM MSC (HPE)	PESHAWAR	01.01.1964	13.03.1986	18.02.2003	19.05.2009	23.05.2018	18	By promotion	GGHSS Chamkani Peshawar
11	MST. MISBAH SEEMA MSC (HPE)	D.I. KHAN	14.05.1964	11.02.1992	18.02.2003	13.10.2010	23.05.2018	18	By promotion	GGHSS Chah Said Munawar Shah No. 6 DIKhan
12	MST. RAHILA BANO MSC (HPE)	D.I. KHAN	24.03.1966	31.05.1992	18.02.2003	13.10.2010	23.05.2018	18	By promotion	GGHSS No.5 Qasaban DIKhan
13	MST. RAFIA KIJATTAK MSC (HPE)	KARAK	09.09.1967	16.11.1994	18.02.2003	19.05.2009	23.05.2018	18	By promotion	GGHSS Mathra Peshawar
14	MST. HAMIDA BAGEM MSC (HPE)	D.I. KHAN	01.01.1967	11.01.1996	18.02.2003	19.05.2009	23.05.2018	18	By promotion	GGHSS No. 9 Din Pur D.I.Khan
15	MST. ABIDA PARVEEN MSC (HPE)	ABBOTTABAD	20.10.1966	01.10.1992	18.02.2003	15.06.2009	23.05.2018	18	By promotion	GGHSS Malakpura Abbottabad
16	MST. ROBINA SHAHEEN MSC (HPE)	BANNU	02.01.1972	07.11.1992	18.02.2003	15.06.2009	23.05.2018	18	By promotion	GGHSS Sikandar Khel Bala Bannu.
17	MST. NABILA TABASUM MSC (HPE)	D.I. KHAN	25.04.1970	25.06.1997	18.02.2003	19.05.2009	23.05.2018	18	By promotion	GGHSS No.2 Peshawar Cantt.
18	MST. PARVEEN AKHTAR MSC (HPE)	MARDAN	15.11.1966	15.11.1984	18.02.2003	24.10.2013	18.04.2019	18	By promotion	GGHSS Akora Khattak NSR
19	MST. DANISH BEGUM MSC (HPE)	MARDAN	14.04.1969	28.02.1995	18.02.2003	19.05.2009	23.05.2018	18	By promotion	GGHSS Shah Dhand Mardan
20	MST. SUGHRA AFANDI MSC (HPE)	MARDAN	01.05.1970	10.10.1995	18.02.2003	15.06.2009	23.05.2018	18	By promotion	GGHSS Rustam Khel Mardan.
21	MST. NIGAR AKHTAR MSC (HPE)	MARDAN	03.04.1976	30.08.1995	06.06.2005	19.05.2009	23.05.2018	18	By promotion	GGHSS Nowshera Cantt. ✓
22	MST. YAIYA BEGUM MSC (HPE)	KARAK	08.06.1973	03.10.1995	06.06.2005	24.10.2013	18.04.2019	18	By promotion	GG Comprehensive HSS Peshawar City ✓
23	MST. REHANA KHATOON MSC (HPE)	KARAK	01.01.1960	18.01.1998	06.06.2005	19.05.2009	23.05.2018	18	By promotion	GGHSS Chokara Karak
24	MST. NAHEED GOHAR MSC (HPE)	MANSEHRA	04.03.1969	17.03.1993	06.06.2005	19.05.2009	23.05.2018	18	By promotion	GGHSS Jangal Khel Kohat
25	MST. MUFEEDA BEGUM MSC (HPE)	SWABI	31.08.1971	11.12.1990	06.06.2005	16.05.2013	05.11.2018	18	By promotion	GGHSS: Shahbaz Garhi Mardan
26	MST. SAMINA AKHTAR MSC (HPE)	KARAK	15.03.1974	23.05.1992	06.06.2005	24.10.2013	18.04.2019	18	By promotion	GGHSS Pir Pai Nowshera
27	MST. ASMA QUARSIII MSC (HPE)	PESHAWAR	06.06.1976	20.01.1995	06.06.2005	19.05.2009	23.05.2018	18	By promotion	GGHSS Lady Griffith Peshawar
28	MST. MUNAZA JAREEN MSC (HPE)	PESHAWAR	10.10.1975	23.11.1995	06.06.2005	19.05.2009	23.05.2018	18	By promotion	GGHSS Tamab Peshawar
29	MST. AZRA NAZ MSC (HPE)	MARDAN	01.02.1970	08.03.1998	06.06.2005	19.05.2009	23.05.2018	18	By promotion	GGHSS Toru Mardan
30	MST. GHAZALA NAEEM MSC (HPE)	KOHAT	15.02.1968	01.01.1988	06.06.2005	13.10.2010	23.05.2018	18	By promotion	GGHSS Behzadi Chakarkot Kohat
31	MST. SUJHAT BEGUM MSC (HPE)	MARDAN	05.09.1972	30.09.1996	06.06.2005	15.06.2009	23.05.2018	18	By promotion	GGHSS Takhtbhai Mardan
32	MST. TASLFEM KAUSAR M.SC (HPE)	MALAKAND	12.10.1974	24.05.2006	24.05.2006	16.05.2013	05.11.2018	18	By promotion	GGHSS Sakhakot Malakand

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33	MST. SAIMA GUL MSC (HPE)	D.I. KHAN	28.04.1979	24.05.2006	24.05.2006	15.06.2009	23.05.2018	18	By promotion	GGHSS Sherazi No. 8 DI Khan
34	MST. ROHILA GUL MSC (HPE)	BANNU	12.10.1980	24.05.2006	24.05.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Koti Sadat Bannu
35	MST. SHAHANA MSC (HPE)	BANNU	05.05.1983	24.05.2006	24.05.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Domel Bannu
36	MST. MIARYAM MUSTAFA MSC (HPE)	ABBOTTABAD	27.11.1978	24.05.2006	24.05.2006	19.05.2009	23.05.2018	18	By promotion	RITE (Female) Abbottabad
37	MST. SAIMA ANDALEEB MSC (HPE)	HARIPUR	05.04.1980	01.09.2004	24.05.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Kot Najibullah Haripur
38	MST. IMTAZ TABASSUM MSC (HPE)	PESHAWAR	15.12.1978	14.01.1998	24.05.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Jogiwara Peshawar
39	MST. BASREET AFZAL MSC (HPE)	MARDAN	20.02.1984	24.05.2006	24.05.2006	13.10.2010	23.05.2018	18	By promotion	GGHSS Hathian Mardan
40	MST. FAKHAR-E-ANJUM MSC (HPE)	MARDAN	13.04.1977	14.12.1999	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Sawal Dher Mardan
41	MST. NIGHAT SEEMA MSC (HPE)	NOWSHERA	05.11.1970	13.03.1993	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Kalu Khan Swabi
42	MST. MARYAM RASOOL MSC (HPE)	HARIPUR	07.01.1970	01.09.1993	12.12.2006	24.10.2013	18.04.2019	18	By promotion	GGHSS Kalabat Township No.2 Haripur
43	MST. SHAHEEN ALI BA MSC (HPE)	SWABI	12.12.1975	04.01.2004	12.12.2006	27.05.2009	23.05.2018	18	By promotion	GGHSS Shewa Swabi
44	MST. MUSSARJ IQBAL MSC (HPE)	KARAK	08.01.1970	13.11.1990	12.12.2006	24.10.2013	18.04.2019	18	By promotion	Working against Principal BS-18 post at GGHSS Karak
45	MST. SARDAR BIBI MSC (HPE)	KARAK	30.05.1970	12.01.1994	12.12.2006	25.10.2011	23.05.2018	18	By promotion	GGHSS No.1 Karak
46	MST. SHERAZ TAJ MSC (HPE)	MARDAN	09.11.1976	08.01.1996	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Gujrat Mardan
47	MST. AFSHEEN MUMTAZ MSC (HPE)	PESHAWAR	23.12.1974	20.11.1994	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Khyber Colony Peshawar
48	MST. SADIA HAZRAT MSC (HPE)	MALAKAND	05.03.1983	02.12.2004	12.12.2006	15.06.2009	23.05.2018	18	By promotion	GGHSS Kopar Malakand
49	MST. SHAHIDA BEGUM MSC (HPE)	KARAK	15.12.1976	17.05.1993	12.12.2006	24.10.2013	18.04.2019	18	By promotion	GGHSS Esak Chuntra Karak
50	MST. RAHANA YASMEEN MSC (HPE)	PESHAWAR	30.04.1971	17.11.1994	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Wadpaga Peshawar
51	MST. HUSSAN BASRI MSC (HPE)	PESHAWAR	02.03.1972	10.07.1997	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Sufaid Sung Peshawar
52	MST. SAIRA ILTAF MSC (HPE)	ABBOTTABAD	01.01.1981	26.06.2005	12.12.2006	15.06.2009	23.05.2018	18	By promotion	GGHSS Kakul Abbottabad
53	MST. SAJIDA NOUSHEEN MSC (HPE)	PESHAWAR	27.07.1960	02.09.1980	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Begum Shahabuddin Peshawar
54	MST. NAZMA SHAHEEN MSC (HPE)	PESHAWAR	30.05.1977	01.10.1996	12.12.2006	16.05.2013	05.11.2018	18	By promotion	GGHSS Larana Peshawar
55	MST. ROBINA SHAHEEN MSC (HPE)	MARDAN	24.01.1965	04.02.2005	10.02.2009	15.06.2009	23.05.2018	18	By promotion	GGHSS Rashakai Nowshera
56	MST. RIFFAT SHAHEEN MSC (HPE)	MANSEHRA	01.03.1967	19.02.2004	10.02.2009	15.06.2009	23.05.2018	18	By promotion	GGHSS Baifa Manselira
57	MST. ARIFA SALEEM MSC (HPE)	PESHAWAR	01.09.1972	20.10.1993	10.02.2009	15.06.2009	23.05.2018	18	By promotion	GGHSS Nishat Abad Peshawar

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 Assistant Director
 Elementary & Secondary Education
 Khyber Pakhtunkhwa, Peshawar


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Annex. "H"
21

To

The Director
Elementary and secondary Education,
Khyber Pakhtunkhwa Peshawar.

Subject; REQUEST FOR CORRECTION IN SENIORITY LIST

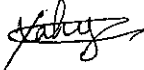
R/Sir,

With due respect it is stated that I have been appointed as PET in Education Department on 03-10-1995 on regular basis. I passed JDPE examination on 16-7-1995 whereas Mst Nigar Akhter was appointed as PET untrained on 30-8-1995 and she passed her JDPE in 1996

It is therefore requested to correct my seniority, I will be very thankful to you.

Your obediently

Date 28/5/2019


YAHYA BEGUM
S.I.P.E
GCGHSS Peshawar


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(22) " I "

**DIRECTORATE OF ELEMENTARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA,
PESHAWAR**

No. 64 / A-25/SIPE (F) Seniority list.
Dated Peshawar the: 27/4 /2020.

To

The Secretary to Govt: of Khyber Pakhtunkhwa,
(E&SE) Department, Peshawar.

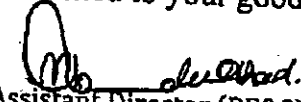
CERTIFICATE

Subject: - **FINAL SENIORITY LIST OF SENIOR INSTRUTORS PHYSICAL
EDUCATION DEPARTMENT BS-18 (FEMALE) E&SE KHYBER
PAKHTUNKHWA.**

I am directed to refer to the subject cited above and to state that Tentative Seniority list of Senior Instructors Physical Education BS-18 (Female) Elementary & Secondary Education Department Khyber Pakhtunkhwa duly approved by the competent authority was uploaded to the official website of E&SE Department Khyber Pakhtunkhwa i.e www.kpese.gov.pk by your good self on dated 16-05-2019 and subsequently circulated by this office amongst all the concerned for rectifying objection if any vide this office letter No. 4526-52 dated 21-05-2019.

I am further directed and to state that some appeals/objections were received on the said tentative seniority list which have been decided by the committee.

Therefore, Draft Final and undisputed Seniority List of Senior Instructors Physical Education BS-18 (Female) Elementary & Secondary Education Department Khyber Pakhtunkhwa as stood on 14-04-2019 is hereby submitted to your good self for further necessary action please.



Assistant Director (PE&S)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar


Endst No. _____ /

Copy forwarded to the: -

1. PA to Director E&SE Khyber Pakhtunkhwa local office.

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Assistant Director (PE&S)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

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**FINAL SENIORITY LIST OF SENIOR INSTRUCTORS PHYSICAL EDUCATION BS-18 (FEMALE) ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
KHYBER PAKHTUNKHWA AS STOOD 14-04-2019**

S.No	Name of Officer with Academic Qualification	Domicile	Date of Birth	D/O Ist Entry Into Govt Service	D/O Apptt: as DPE BS-16 (Regular)	D/O Award of BS-17 (Regular)	Regular Apptt/Promotion to the present post			Place of Posting
							D/O Award of BS-18 (Regular)	BPS	Method or recruitment	
1	2	3	4	5	6	7	8	9	10	11
1	MST. SAMINA HABIB MSC (HPE)	KOHAT	01.05.1960	01.09.1981	23.02.1988	15.06.2009	23.05.2018	18	By promotion	GGHSS Bilitang Kohat
2	MST. DILSHAD BEGUM MSC (HPE)	PESHAWAR	28.08.1960	27.05.1979	20.08.1990	19.05.2009	23.05.2018	18	By PSC	GGHSS Ghoriwala Bannu.
3	MST. SAFINA BABAR MSC (HPE)	NOWSHERA	06.01.1962	26.08.1990	26.08.1990	19.05.2009	23.05.2018	18	By PSC	GGHSS University Town Peshawar
4	MST. SHAHEEN ANWAR MSC (HPE)	ABBOTTABAD	03.06.1963	24.07.1991	24.07.1991	19.05.2009	23.05.2018	18	By promotion	GGHSS Abbottabad
5	MST. REHANA PARVEEN MSC (HPE)	D.I. KHAN	10.02.1963	24.07.1991	24.07.1991	19.05.2009	23.05.2018	18	By PSC	GGHSS Prova DI Khan
6	MST. SHAHIDA BEGUM MSC (HPE)	NOWSHERA	01.09.1967	07.01.1990	16.05.1997	19.05.2009	23.05.2018	18	By PSC	GGHSS Nowshera Kalan.
7	MST. NOSHEEN ALAM M.SC (HPE)	BANNU	08.08.1973	16.05.1997	16.05.1997	16/08/2016	27.12.2018 (ACB)	18	By PSC	GGHSS Mamash Khel Bannu
8	MST. SHABNAM JADOON MSC (HPE)	ABBOTTABAD	05.04.1968	16.05.1997	16.05.1997	19.05.2009	23.05.2018	18	By PSC	GGHSS Dhamtour Abbottabad
9	MST. TAMSELLA NAZ MSC (HPE)	D.I. KHAN	31.08.1967	06.03.1990	16.05.1997	19.05.2009	23.05.2018	18	By PSC	R.I.T.E (F) D.I Khan
10	MST. NAUREEN ANWAR MSC (HPE)	KOHAT	03.05.1968	16.05.1997	16.05.1997	19.05.2009	23.05.2018	18	By PSC	RITE (F) Peshawar.
11	MST. SAEEDA BEGUM MSC (HPE)	PESHAWAR	01.01.1964	13.03.1986	18.02.2003	19.05.2009	23.05.2018	18	By promotion	GGHSS Chamkani Peshawar
12	MST. MISBAH SEEMA MSC (HPE)	D.I. KHAN	14.05.1964	11.02.1992	18.02.2003	13.10.2010	23.05.2018	18	By promotion	GGHSS Chah Said Munawar Shah No. 6 DIKhan
13	MST. RAHILA BANO MSC (HPE)	D.I. KHAN	24.03.1966	31.05.1992	18.02.2003	13.10.2010	23.05.2018	18	By promotion	GGHSS No.5 Qasaban DIKhan
14	MST. RAFIA KHATTAK MSC (HPE)	KARAK	09.09.1967	16.11.1994	18.02.2003	19.05.2009	23.05.2018	18	By promotion	GGHSS Mathra Peshawar
15	MST. FARZANA YASMEEN MSC (HPE)	D.I. KHAN	01.05.1972	22.04.1996	18.02.2003	16/08/2016	27.12.2018 (ACB)	18	By promotion	GGHSS Kulachi D.I Khan
16	MST. HAMIDA BAGEM MSC (HPE)	D.I. KHAN	01.01.1967	11.01.1996	18.02.2003	19.05.2009	23.05.2018	18	By promotion	GGHSS No. 9 Din Pur D.I.Khan
17	MST. ABIDA PARVEEN MSC (HPE)	ABBOTTABAD	20.10.1966	01.10.1992	18.02.2003	15.06.2009	23.05.2018	18	By promotion	GGHSS Malakpura Abbottabad
18	MST. ROBINA SHAHEEN MSC (HPE)	BANNU	02.01.1972	07.11.1992	18.02.2003	15.06.2009	23.05.2018	18	By promotion	GGHSS Sikandar Khel Bala Bannu.
19	MST. NABILA TABASUM MSC (HPE)	D.I. KHAN	25.04.1970	25.06.1997	18.02.2003	19.05.2009	23.05.2018	18	By promotion	GGHSS No.2 Peshawar Cantt.
20	MST. PARVEEN AKHTAR MSC (HPE)	MARDAN	15.11.1966	15.11.1984	18.02.2003	24.10.2013	18.04.2019	18	By promotion	GGHSS Akora Khattak NSR
21	MST. DANISH BEGUM MSC (HPE)	MARDAN	14.04.1969	28.02.1995	18.02.2003	19.05.2009	23.05.2018	18	By promotion	GGHSS Shah Dhand Mardan
22	MST. SUGHRA AFANDI MSC (HPE)	MARDAN	01.05.1970	10.10.1995	18.02.2003	15.06.2009	23.05.2018	18	By promotion	GGHSS Rustam Khel Mardan.
23	MST. NIGAR AKHTAR MSC (HPE)	MARDAN	03.04.1976	30.08.1995	06.06.2005	19.05.2009	23.05.2018	18	By promotion	GGHSS Nowshera Cantt.
24	MST. YAHYA BEGUM MSC (HPE)	KARAK	08.06.1973	03.10.1995	06.06.2005	24.10.2013	18.04.2019	18	By promotion	GG Comprehensive HSS Peshawar City
25	MST. NAHEED GOHAR MSC (HPE)	MANSEHRA	04.03.1969	17.03.1993	06.06.2005	19.05.2009	23.05.2018	18	By promotion	GGHSS Jangal Khel Kohat
26	MST. MUFEEDA BEGUM MSC (HPE)	SWABI	31.08.1971	11.12.1990	06.06.2005	16.05.2013	05.11.2018	18	By promotion	GGHSS; Shahbaz Garhi Mardan
27	MST. SAMINA AKHTAR MSC (HPE)	KARAK	15.03.1974	23.05.1992	06.06.2005	24.10.2013	18.04.2019	18	By promotion	GGHSS Pir Pai Nowshera
28	MST. ASMA QUARSHI MSC (HPE)	PESHAWAR	06.06.1976	20.01.1995	06.06.2005	19.05.2009	23.05.2018	18	By promotion	GGHSS Lady Griffith Peshawar
29	MST. MUNAZA JABEEN MSC (HPE)	PESHAWAR	10.10.1975	23.11.1995	06.06.2005	19.05.2009	23.05.2018	18	By promotion	GGHSS Tarnab Peshawar
30	MST. AZRA NAZ MSC (HPE)	MARDAN	01.02.1970	08.03.1998	06.06.2005	19.05.2009	23.05.2018	18	By promotion	GGHSS Toru Mardan
31	MST. GHAZALA NAEEM MSC (HPE)	KOHAT	15.02.1968	01.01.1988	06.06.2005	13.10.2010	23.05.2018	18	By promotion	GGHSS Behzadi Chakarkot Kohat
32	MST. SUJHAT BEGUM MSC (HPE)	MARDAN	05.09.1972	30.09.1996	06.06.2005	15.06.2009	23.05.2018	18	By promotion	GGHSS Takhtbhai Mardan
33	MST. BASREET AFZAL MSC (HPE)	MARDAN	20.02.1984	27.05.2006	27.05.2006	13.10.2010	23.05.2018	18	By PSC	GGHSS Hathian Mardan.
34	MST. ROHILA GUL MSC (HPE)	BANNU	12.10.1980	27.05.2006	27.05.2006	19.05.2009	23.05.2018	18	By PSC	GGHSS Koti Sadat Bannu

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Final Impressed
Seniority List

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FINAL SENIORITY LIST OF SENIOR INSTRUCTORS PHYSICAL EDUCATION BS-18 (FEMALE) ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT KHYBER PAKHTUNKHWA AS STOOD 14-04-2019										
S.No	Name of Officer with Academic Qualification	Domicile	Date of Birth	D/O Ist Entry into Govt Service	D/O Apptt: as DPE BS-16 (Regular)	D/O Award of BS-17 (Regular)	Regular Apptt/Promotion to the present post			Place of Posting
							D/O Award of BS-18 (Regular)	BPS	Method or recruitment	
1	2	3	4	5	6	7	8	9	10	11
35	MST. SAIMA ANDALEEB MSC (HPE)	HARIPUR	05.04.1980	01.09.2004	27.05.2006	19.05.2009	23.05.2018	18	By PSC	GGHSS Kot Najibullah Haripur
36	MST. SHAHANA MSC (HPE)	BANNU	05.05.1983	27.05.2006	27.05.2006	19.05.2009	23.05.2018	18	By PSC	GGHSS Domel Bannu
37	MST. IMTAZ TABASSUM MSC (HPE)	PESHAWAR	15.12.1978	14.01.1998	27.05.2006	19.05.2009	23.05.2018	18	By PSC	GGHSS Jogiwara Peshawar
38	MST. SAIMA GUL MSC (HPE)	D.I. KHAN	28.04.1979	27.05.2006	27.05.2006	15.06.2009	23.05.2018	18	By PSC	GGHSS Sherazi No. 8 DI Khan
39	MST. TASLEEM KAUSAR MSC (HPE)	MALAKAND	12.10.1974	27.05.2006	27.05.2006	16.05.2013	05.11.2018	18	By PSC	GGHSS Sakhakot Malakand
40	MST. MIARYAM MUSTAFA MSC (HPE)	ABBOTTABAD	27.11.1978	27.05.2006	27.05.2006	19.05.2009	23.05.2018	18	By PSC	RJTE (Female) Abbottabad
41	MST. FAKHAR-E-ANJUM MSC (HPE)	MARDAN	13.04.1977	01.12.1999	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Sawal Dher Mardan
42	MST. NIGHAT SEEMA MSC (HPE)	NEWSHERA	05.11.1970	13.03.1993	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Kalu Khan Swabi
43	MST. MARYAM RASOOL MSC (HPE)	HARIPUR	07.01.1970	01.09.1993	12.12.2006	24.10.2013	18.04.2019	18	By promotion	GGHSS Kalabat Township No,2 Haripur
44	MST. SHAHEEN ALI MSC (HPE)	SWABI	12.12.1975	04.01.2004	12.12.2006	27.05.2009	23.05.2018	18	By promotion	GGHSS Shewa Swabi
45	MST. MUSSARJ IQBAL MSC (HPE)	KARAK	08.01.1970	13.11.1990	12.12.2006	24.10.2013	18.04.2019	18	By promotion	Working against Principal BS-18 post at GGHSS Karak
46	MST. SARDAR BIBI MSC (HPE)	KARAK	30.05.1970	12.01.1994	12.12.2006	25.10.2011	23.05.2018	18	By promotion	GGHSS No.1 Karak
47	MST. SHERAZ TAJ MSC (HPE)	MARDAN	09.11.1976	08.01.1996	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Gujrat Mardan.
48	MST. AFSHEEN MUMTAZ MSC (HPE)	PESHAWAR	23.12.1974	20.11.1994	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Khyber Colony Peshawar
49	MST. SADIA HAZRAT MSC (HPE)	MALAKAND	05.03.1983	02.12.2004	12.12.2006	15.06.2009	23.05.2018	18	By promotion	GGHSS Kopar Malakand
50	MST. SHAHIDA BEGUM MSC (HPE)	KARAK	15.12.1976	17.05.1993	12.12.2006	24.10.2013	18.04.2019	18	By promotion	GGHSS Esak Chuntra Karak
51	MST. RAHANA YASMEEN MSC (HPE)	PESHAWAR	30.04.1971	17.11.1994	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Wadpaga Peshawar
52	MST. HUSSAN BASRI MSC (HPE)	PESHAWAR	02.03.1972	10.07.1997	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Sufaid Sung Peshawar.
53	MST. SAIRA ILTAF MSC (HPE)	ABBOTTABAD	01.01.1981	26.06.2005	12.12.2006	15.06.2009	23.05.2018	18	By promotion	GGHSS Kakul Abbottabad
54	MST. SAJIDA NOUSHEEN MSC (HPE)	PESHAWAR	27.07.1960	02.09.1980	12.12.2006	19.05.2009	23.05.2018	18	By promotion	GGHSS Begum Shahabuddin Peshawar
55	MST. NAZMA SHAHEEN MSC (HPE)	PESHAWAR	30.05.1977	01.10.1996	12.12.2006	16.05.2013	05.11.2018	18	By promotion	GGHSS Larama Peshawar
56	MST. ROBINA SHAHEEN MSC (HPE)	MARDAN	24.01.1965	04.02.2005	10.02.2009	15.06.2009	23.05.2018	18	By promotion	GGHSS Rashakai Nowshera
57	MST. RIFFAT SHAHEEN MSC (HPE)	MANSEHRA	01.03.1967	19.02.2004	10.02.2009	15.06.2009	23.05.2018	18	By promotion	GGHSS Baffa Mansehra
58	MST. ARIFA SALEEM MSC (HPE)	PESHAWAR	01.09.1972	20.10.1993	10.02.2009	15.06.2009	23.05.2018	18	By promotion	GGHSS Nishtar Abad Peshawar

It is certified: -

- 1 That the Seniority list is widely circulated.
- 2 That the Seniority list is undisputed/uncontroversial.
- 3 That there is no litigation pending/involved.

Sd
Assistant Director (PE&S)
Elementary & Secondary Education
Khyber Pakhtunkhwa

[Signature]
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Diary No: 2228
dated: 18/5/2020

25-01

Annex

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To

The Secretary to Govt: of Khyber Pakhtunkhwa,
Elementary & Secondary Education Department.

Subject: DEPARTMENTAL APPEAL

Dear Sir,

1. That I have been appointed as P.E.T BPS-09 by Divisional Director of Education, Kohat Division vide appointment order dated: 02/10/1995.

(Copy of order is attached as "A")

2. That due to my hard work and diligence toward my official duties, I have been promoted step by step under the prevailing rules and regulations and finally promoted to the post of SIPE (BPS-18) and presently working in the same post.

(Copy of notification is attached as "B")

3. That during my entire service in Education Department, I tried my best to become fully acquainted with the modern education techniques and for this purpose, I attended all compulsory trainings and courses in time, not only for the purpose of promotion but to impart standard education to the students also.

4. That the Education Department vide notification No.SO(S)6-2/90/1 dated: 18/10/1994 laid down the method of recruitment, qualification and other condition as well as the promotion criteria as well.

(Copy of notification is attached as "C")

5. That the Education Department vide Notification No.SO(S)6-2/98/service rules dated: 15/01/1999 made further amendments in Notification No.SO(S)6-2/90/1 dated: 18/10/1994 and since 1999 the subsequent amended notification shall have to be followed.

(Copy of notification is attached as "D")

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6. That the Education Department by following the same promotion criteria as mentioned in Notification dated: 15/01/1999 prepared various seniority lists on annual basis as per their requirement. Here I have annexed only two seniority lists of the year 2004 and 2006 for ready reference.

(Copy of seniority lists are annexed as "E" & "F")

7. That by following the amended criteria for promotion as referred in Notification dated: 15/01/1999, the following formulas shall be adopted for reckoning the seniority position of the official and the same is reflected in the 2006 seniority list.

SENIORITY RECKONING FORMULA FROM DPE POST TO SDPE POST

- i. *If SDPE degree was obtained before 1st appointment, the seniority shall be reckoned from date of 1st appointment.*
- ✓ ii. *If the SDPE degree was obtained after 1st appointment, the seniority of the officer shall be reckoned from the declaration of result of SDPE.*
- iii. *If the date of declaration of result of SDPE of the officers were same, the seniority of the officer shall be reckoned from the date of 1st appointment.*
- iv. *If the date of 1st appointment of the officers were same, the seniority of the officer shall be reckoned from the date of birth.*

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8. That despite the clear rules are available for reckoning the seniority position but I was shocked while seeing the tentative seniority list where I was placed at serial No.22 after Mst: Nigar Akhtar. Although, I passed SDPE examination on ¹¹⁻⁶⁻²⁰⁰² ~~16/07/1995~~ where as Mst: Nigar Akhtar passed her SDPE examination in ¹⁻²⁻²⁰⁰³ ~~1996~~. Therefore, she should have been considered junior to me under the amended rules.

(Copy of tentative seniority list is attached as "G")

9. That I soon after getting knowledge of such discrimination and violation of rules, made objection on the tentative list and requested the concerned officers for making correction.

(Copy of application is attached as "H")

10. That I once again shocked where the Education Department issued a final seniority list vide letter No.64/A-25/SIPE(F) seniority list dated: 27/04/2020 and I was again placed junior to Mst: Nigar Akhtar which is gross violation of the available rules as well as discrimination with me.

(Copy of final seniority list is attached as "I")

11. That I am aggrieved from the impugned seniority list issue by the Education Department as the same is illegal and violation of the prevailing rules as well as discrimination with the applicant.

12. That as my request was not positively entertained and no correction was made by the concerned officers, therefore, if had no other option but to file the instant departmental appeal before the competent authority.

It is therefore, humbly prayed that by accepting the instant departmental appeal, I may be placed senior to Mst: Nigar Akhtar in the seniority list and as and when the competent authority pleased to promote the officers, the undersigned may be considered senior to Mst: Nigar Akhtar.

It is further requested that in the meanwhile, no promotion order/notification of the officer from impugned seniority list may be issued, till final disposal of the instant appeal.

Dated: 18-05-2020

ATTESTED

ATTESTED
to be a true copy

Yours Sincerely,

Yahyah Bagum

YAHYAH BAGUM

S.I.P.E

G. GHSS PIR PIR, NOWSHERA

NIC NO. 14203-1786861-6

Mobile No. 0334-9016717

GOMAL UNIVERSITY

DERA ISMAIL KHAN

(N.W.F.P)

PAKISTAN



(Session 1996-97)

YAHYA BEGUM. DAUGHTER of SUB. GUL NAWAZ KHAN.

and a student of the ROYAL COLLEGE OF PHYSICAL EDUCATION, PESHAWAR (P.V.)
Department of Health and Physical Education
Gomal University having passed the prescribed examination
FEBRUARY, 2001 19, is this day admitted by the Gomal
University to the

Senior Diploma in Physical Education

in the SECOND Division, is qualified to supervise Physical Education
and to teach this subject in Colleges and Schools.

The Examination was taken as a whole/in parts.

Date of Birth 08-06-1973 (EIGHTH JUNE N.H. & SEVENTY THREE)

Registered No. 479-PEDU-92

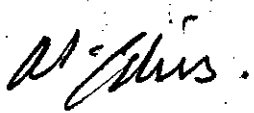
Roll No. 4411

ATTESTED

JUNE 11, 19 2002

Countersigned


Controller of Examinations


Vice-Chancellor

قیمت 50 روپے	55651			
ایڈریس: اظہر عباس		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: 60-10-9108				
رابطہ نمبر:				

بعدالت جناب: چیمبر میں صاحب سروسز ٹریڈنگ کمپنی کے

مخاطب:	دعویٰ: Service Appeal
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آنکہ

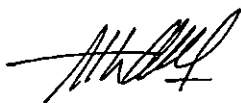
مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام سروسز ٹریڈنگ کمپنی کے ایڈیٹر اظہر عباس د محمد ہمایوں کے درمیان کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقریر ثالث و فیصلہ برحلاف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف سے یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانہ اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے


المرقوم: 2020-8-18

مقام سروسز ٹریڈنگ کمپنی کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

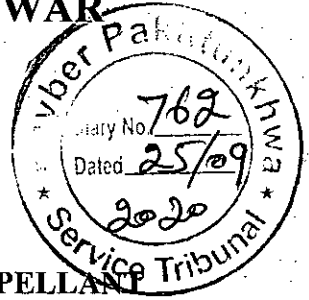
Accepted by





BEFORE THE HON'BLE CHAIRMAN KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

Early hearing Application
in
S.A No. 9409/2020



YAHYA BEGUM

.....APPLICANT/APPELLANT

VERSUS

GOVT: OF KHYBER PAKHTUNKHWA, THROUGH CHIEF
SECRETARY AND OTHERS

.....RESPONDENTS

APPLICATION FOR EARLY HEARING

Respectfully Sheweth:

1. That the captioned service appeal is pending adjudication before this Hon'ble Tribunal in which dated: 24/11/2020 is fixed for hearing.
2. That the applicant/appellant file the instant application for fixing early possible date of hearing on the following grounds inter-alia: -

GROUND:

- A. That the applicant/appellant has valuable rights with the captioned appeal, as the applicant/appellant was aggrieved from the respondents.
- B. That the applicant filed the service appeal few days back before this Hon'ble Tribunal, in which the official concerned did not give any date to the appellant's counsel due to examining the documents.
- C. That the applicant's counsel constantly checks the notice board but my case was not mentioned in the affixed lists of the new cases.

Put up to the court with relevant appeal.

30/9/2020

Be accelerated to a date in 3rd week of October 2020.

*hu
30/9
21/10
Q*

- D. That the applicant's counsel finally asked the date from the concerned official of the tribunal who told that my case was fixed on 21/09/2020 and now the next date is 24/11/2020. I checked the list regularly but never found my case due the reason neither my client nor I appear on the date fixed and about two months date was fixed in my case.
- E. That applicant/appellant has great apprehension that the respondents with mala-fide intention conducted the PSB meeting for promotion of other employees.
- F. That if the PSB was conducted in the meanwhile, the appellant would suffer a lot and the service appeal will be infructuous.
- G. That there is no legal embargo, if the Hon'ble tribunal may graciously be fixed early date of hearing.

It is therefore, humbly prayed that early possible date may be fixed in my service appeal.

APPLICANT/APELLANT

Dated: 25-9-20

Through



ATHAR ABBAS
Advocate
High court, Peshawar.