

16th Dec. 2022

SCANNED
K. ST
Peshawar

Counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present. Mrs. Rozina Rehman, learned Member (J) is on leave, therefore, D.B is incomplete. The case is adjourned to 08.03.2023 for arguments before the D.B.


(Fareeha Paul)
Member(E)

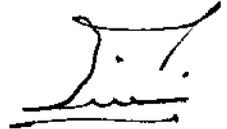
27.06.2022

Learned counsel for the appellant present. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that she has not made preparation for arguments. Adjourned. To come up for arguments on 18.08.2022 before the D.B.



(Rozina Rehman)
Member (J)



(Salah-ud-Din)
Member (J)

18.8.2022

Due to summer vacation the case is adjourned to 16-9-22 for the same.



16.09.2022

Appellant present through counsel.

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

Arguments could not be heard as learned Member Executive (Miss. Fareeha Paul) is on leave. Therefore, case is adjourned to 04.11.2022 for arguments before D.B.



(Rozina Rehman)
Member (J)

4th Nov. 2022

Lawyers are on strike today.

To come up for arguments on 16.12.2022 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.



(Fareeha Paul)
Member(E)



(Kalim Arshad Khan)
Chairman

01.09.2021

Mr. Farhan Tariq, Advocate, for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that certain documents upon which the appellant is relying has not yet been provided to him, therefore, an adjournment may be granted. Adjourned. To come up for arguments before the D.B on 29.11.2021.



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



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

29.11.2021

Due to unavailability of DB, the case is adjourned to 07-03-2022.



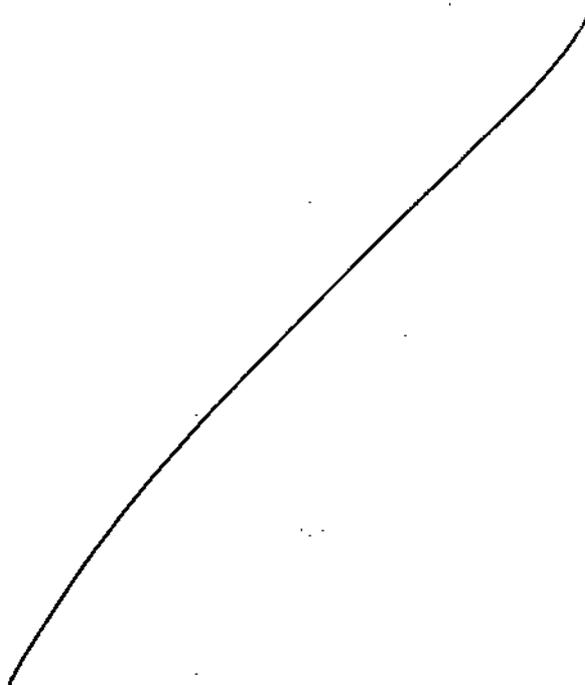
Amir
Reader

7-3-22

Due to retirement of the Honble Chairman the case is adjourned on 27-6-22



Amir
Reader



29.12.2020

Due to summer vacation, case is adjourned to 31.03.2021 for the same as before.


Reader

31.03.2021

Junior to counsel for the appellant present.

Mr. Kabirullah Khattak, Addl. A.G for respondents present.

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, case is adjourned to 13.07.2021 for arguments before the D.B.


(Atiqur Rehman Wazir)
Member(E)


(Rozina Rehman)
Member(J)

13.07.2021

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

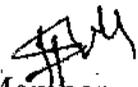
Clerk of counsel for the appellant stated that learned counsel for the appellant is unable to attend the Tribunal today due to strike of Lawyers. Adjourned To come up for arguments before the D.B. on 01.09.2021


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


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

13.03.2020

Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney present Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 14.05.2020 before D.B.


Member


Member

14.05.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 17.08.2020 before D.B.


Reader

17.08.2020

Due to summer vacations, the case is adjourned to 19.10.2020 for the same.


Reader

19.10.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

The Bar is observing general strike today, therefore, the matter is adjourned ^{to} 29.12.2020 for hearing before the

D.B.

20

(Mian Muhammad)
Member


Chairman

28.08.2019

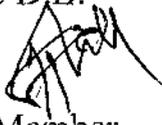
Clerk to counsel for the appellant present. Asst: AG for respondents present. Clerk to counsel for appellant submitted an application for adjournment. Adjourn. Case to come up for arguments on 12.11.2019 before D.B.


Member


Member

12.11.2019

Mohsin Kamran Advocate on behalf of learned counsel for the appellant present. Mr. Zia Ullah learned Deputy District Attorney for the respondents present. Mohsin Kamran Advocate submitted additional documents and seeks adjournment. Adjourn. To come up for further proceedings on 13.01.2020 before D.B.


Member


Member

13.01.2020

Appellant absent. Learned counsel for the appellant absent. Mr. Usman Ghani learned District Attorney present. Due to general strike of the Bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings/arguments on 13.03.2020 before D.B. Appellant be put to notice for the date fixed.


Member


Member

28.1.2019

Mr. Farhan Tariq, Advocate for appellant and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Learned counsel for the appellant requests for time to submit rejoinder to the written reply submitted by the respondents. Adjourned to 08.04.2019 for arguments before the D.B. The appellant may furnish rejoinder within a fortnight.


Member


Chairman

08.04.2019

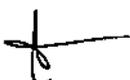
Clerk to counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Clerk to counsel for the appellant submitted rejoinder and seeks adjournment as learned counsel for the appellant is not available. Adjourn. To come up for arguments on 25.06.2019 before D.B.


Member


Member

25.06.2019

Counsel for the appellant and Addl. AG for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. Case to come up for arguments on 28.08.2019 before D.B.


Member


Member

24.10.2018

Due to retirement of Hon'ble Chairman, the Tribunal is incomplete. Therefore, the case is adjourned. To come up for the same on 12.12.2018.


Reader

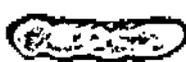
12.12.2018

Clerk of Mr. Farhan Tariq, Advocate has submitted fresh Wakalatnama on behalf of appellant and requests for adjournment due to pre-occupation of learned counsel before the Hon'ble High Court. Mr. Ziaullah, DDA for the respondents present.

Adjourned to 28.01.2019 for hearing before the D.B.

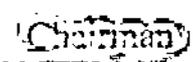

Member


Chairman



~~Mr. Farhan Tariq, Advocate has submitted fresh Wakalatnama on behalf of appellant and requests for adjournment due to pre-occupation of learned counsel before the Hon'ble High Court. Mr. Ziaullah, DDA for the respondents present.~~





20.12.2017

Counsel for the appellant and Mr. Muhammad Jan, DDA for the respondents present. Counsel for the appellant seeks adjournment. Granted. To come up for arguments on 20.02.2018 before the D.B.


Member


Chairman

20.02.2018

Due to non availability of D.B. Adjourned. To come up on 25.04.2018 before D.B.

25.04.2018


(Gul Zeb Khan)
Counsel for the appellant and Addl: AG for respondents present. Due to retirement of the worthy Chairman, the Tribunal is incomplete, therefore the case is adjourned. To come up for arguments on 11.07.2018 before D.B.


Reader

11.07.2018

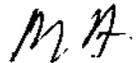
Clerk to counsel for the appellant and Mr. Zia Ullah, learned Deputy District Attorney present. Due to general strike of the bar, the case is adjourned. To come up on 05.09.2018 before D.B.


(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member

05.09.2018

Appellant absent. Learned counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 24.10.2018 before D.B.


(M. Amin Khan Kundi)
Member


(M. Hamid Mughal)
Member

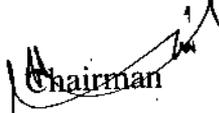
13.06.2017

Husband of the appellant and Addl:AG alongwith Inayat Ullah, ADO for respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 24.07.2017 before S.B.


(Ahmad Hassan)
Member

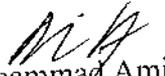
24.07.2017

Clerk of counsel for the appellant and Asstt. AG present. Fresh notices be issued to the respondents. To come up for written reply/comments on 29.08.2017 before S.B.


Chairman

29.08.2017

Counsel for the appellant present. Mr. Inayatullah, ADEO (litigation) alongwith Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Written reply not submitted. Learned Additional AG requested for further adjournment. Adjourned. To come up for written reply/comments on 19.09.2017 before S.B.


(Muhammad Amin Khan Kundi)
Member

19.09.2017

Husband of the appellant and Addl: AG alongwith Mr. Hameed Ur Rehman, AD(Lit) and Inayat Ullah, ADO for respondents present. Written reply submitted. To come up for rejoinder and final hearing on 20.12.2017 before D.B.


(Ahmad Hassan)
Member

03.04.2017

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as PST (BPS-12). That vide impugned order dated 02.03.2013 junior colleagues of the appellant were promoted while appellant ignored despite eligibility. That vide another impugned order dated 23.5.2015 again junior colleagues of the appellant were promoted to BPS-14 while appellant ignored despite seniority and eligibility constraining her to prefer departmental appeal on 21.11.2016 which was not responded and hence the instant service appeal on 23.02.2017.

That the appellant is entitled for promotion w.e.f the date when juniors to her were promoted and appellant ignored despite eligibility.

Appellant Deposited
Security & Process Fee

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 08.05.2017 before S.B.

Chairman

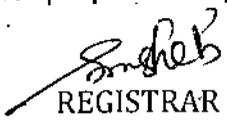
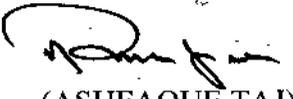
08.05.2017

Husband of the appellant present. Mr. Musharraf Hussan alongwith Mr. Muhammad Adeel Butt, Additional: AG for the respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply /comments on 13.06.2017 before S.B.

Chairman

Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 200/2017

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	27/02/2017	<p style="text-align: center;">The appeal of Mst. Saba Gul resubmitted today by Uzma Syed 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-	27.2.2017	<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>08-03-2017</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	08.03.2017	<p style="text-align: center;">None present on behalf of the appellant. Notice be issued to appellant and his counsel for prosecution for 03.04.2017 before S.B.</p> <p style="text-align: right;"> (ASHFAQUE TAJ) MEMBER</p>

SCANNED
K- ST
awaf

The appeal of Mr^e Saba Gul d/o Mian Tahir Shah PST GGPS Risalpur Distt. Nowshera received today i.e on 23.02.2017 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Copy of notification dated 02.03.2015 mentioned in para-7 & 8 of the appeal is not attached with the appeal which may be placed on it.
- 2- Annexure-A and C of the appeal are illegible which may be replaced by legible/better one.
- 3- The annexures of the appeal may be attested.
- 4- Appeal may be page marked according to the Index of the appeal.

No. 400 /S.T,

Dt. 23/2 /2017


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Uzma Syed Adv. Pesh.

re-submitted after compliance

Uzma

BEFORE THE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR

Services Appeal No. 200 /2017

Saba Gul

VERSUS

Secretary to Govt of KPK etc

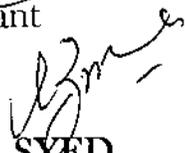
INDEX

S.No.	Description	Annexure	Pages
1.	Services Appeal		1-5
2.	Verification / affidavit		6
3.	Appointment order	A	7-13
4.	Transfer order with, report of leaving charge	B	14-15
5.	Promotion notification	C	16-20
6.	Notification dated 23/05/2015	D	21-26
7.	Application	D/1	27-29
8.	Departmental appeal	E	30-32
9.	Wakalat Nama		33

Dated: 23/02/2017

Through


Appellant


UZMA SYED,
Advocate, High Court, Peshawar



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL.....200...../2017

Saba Gul D/o MianTahir Shah PST Teacher Govt. Girls Primary School
RisalpurDistirctNowshera. Appellant

VS

1. Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
3. District Officer Elementary & Secondary Education (Female) District Nowshera.
4. District Officer Elementary & Secondary Education (Female) District Swabi
..... Respondents

SERVICE APPEAL UNDER SECTION-4 OF THE KPK SERVICE TRIBUNAL ACT
AGAINT NOT CONSIDERING THE APPELLANT FOR PROMOTION TO THE
POST OF SENIOR PRIMARY SCHOOL TEACHER W.E.F 02-03-2013 I.E. THE
DATE WHEN JUNIORS TO THE APPELLANT WERE PROMOTED AS
SPST(SENIOR PRIMARY SCHOOL TEACHER (BPS-14) WHILE THE
APPELLABNT HAS BEEN IGNORED DESPITE BEING SENIOR AND ELIGIBLE.

PRAYER.

THAT ON ACCEPTANCE OF THIS APPEAL THE APPELLANT MAY PLEASE BE
CONSIDERED FOR PROMOTION TO THE POST OF SENIOR PRIMARY
SCHOOL TEACHER (BPS-14) W.E.F 02-03-2013 i.e. THE DATE WHEN
JUNIORS TO THE APPELLANT WERE PROMOTED AS (SPST BPS-14), AND

THE APPELLANT MAY ALSO BE ALLOWED BACK/ CONSEQUENTIAL BENEFITS.

RESPECTFULLY SHEWETH:-

FACTS.

Brief facts giving rise to the present appeal as under:-

1. That the appellant was initially appointed as Primary School Teacher vide order dated 20-10-2004, in the Education Department District Swabi and was posted at GGPS No. 2 Jehangera (Swabi) and duly took over charge of the post and started her duties (As Annexure – A).
2. That later on the appellant was transferred to District Nowshera vide order dated 02-06-2007. The appellant duly took charge of her new place of posting on 09-06-2007, and started performing her duties. During the course of her service the appellant also upgraded to BPS-12 (Transfer order and charge report as Annexure –B)
3. That ever since her appointment the appellant was performing her duties as assigned with zeal and devotion and have never given any change of complaint whatsoever regarding her performance.
4. That the next post in the channel of promotion to the post of PST BPS-12 is SPST. BPS-14. It is pertinent to mention here that in the year 2013, there were 326 posts of Senior Primary Schools Teachers which were to be filled from amongst the Primary School Teachers.
5. That as per date of appointment, the appellant was well within the promotion zone and was hopeful that she will be promoted.

6. That in the year 2013, promotion notification dated 02-03-2013 was issued wherein as many as 247 PST (BPS12) were promoted to SPST BPS-14, however the appellant was ignored (~~copy of order as Annexure - C~~).
7. That when the appellant to know about the notification dated 02-03-2013 the appellant was astonished to see that the appellant name was not included in the list of promotes while juniors to the appellant were promoted, the candidates at S.No 246 and 247 were admittedly junior to appellant as per the date of their appointments, however they were promoted while the appellant was ignored (promotion order dated 02-03-2013 as Annexure - ~~D~~).
8. That there after another notification dated 23-05-2015, however again the appellant was ignored from due right of promotions (copy of order dated 23-05-15 as Annexure as ~~D~~).
9. That the appellant submitted an application for the grant of promotion to BPS 14 and against the injustice was done in the promotion cases by promoting juniors officials and ignored seniors, the same was duly forwarded for necessary action vide application dated 21-10-2015, the appellant also made different complaints thereafter different correspondences were made but in vain (application with covering letter as Annexure -E).
10. That as a last resort the appellant is constrained to submit the instant appeal inter alia on the following grounds.

GROUND.

- A. That the appellant has not been treated in accordance with law hence appellant rights secured and granted under the law are badly violated.

- B. That the mandatory provision of section 9 of Khyber Pakhtunkhwa (then NWFP) Civil Servants Act 1973 read with Khyber Pakhtunkhwa (then NWFP) Civil Servants (Appointment, Promotions and transfer) Rules, 1989 and enabling instructions contained in the ESTA Code have not been adhered thus the appellant have been deprived of her legal and due rights.
- C. That no reason whatsoever has been communicated to the appellant for her deferment. Non consideration from promotion.
- D. That the appellant was the senior most and was the promotion zone moreover there were vacancies also available, but quite illegally the appellant was not denied promotion while juniors to appellant has been promoted, which is highly illegal unlawful and violitive upon the rights of the appellant.
- E. That the Notification of Promotion wherein the appellant has been denied promotion is highly illegal unlawful against the law and facts.
- F. That the performance of the appellant is up to all standers, during the course of her service neither the appellant has been proceeded against on any disciplinary ground nor there has been any complaint whatsoever recording her performance albeit the appellant has been deprived of her due right of promotion.
- G. That the law never permits that a department should make its employees to suffer for any fault on its part.
- H. That the appellant has a clean and spotless service carrier at her credit thus deserves to be considered for promotion.

It is, therefore, humbly prayed that on acceptance of this appeal the appellant may please be considered for promotion to the post of Senior Primary School Teacher (SPTS BPS-14) w.e.f 2-3-2013, i.e. is the date when juniors to the appellant were promoted as Senior Primary School Teacher (SPTS BPS-14), the appellant may also be allowed back / consequential benefits.

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


Appellant

Through


Uzma Syed
(Advocate High Court)

Date : 2 : 2017

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

SERVICE APPEAL.-----/2017

Saba Gul.....Appelant Vs Education

Verification that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.


Applicant/Appellant

(A)

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY) SWABI
APPOINTMENT OF PST (FEMALE)**

Consequent upon the approval of the competent authority, the following female candidates are hereby appointed as PST in EPS-07 (Rs. 2220-120-5020), EPS-06 (Rs. 2150-110-5400), EPS-05 (Rs. 2100-100-5100) OR EPS-04 (Rs. 2040-85-4500) according to candidate's qualification as per the Govt. existing policy plus usual allowances as admissible under the rules on regular/contract basis, school specific in the schools noted against each in the list in respect of public service with immediate effect.

25% Open Merit

S#	Name	Father's Name	UC Council	Address	Score	Posted	Remarks
1	Sajida Begum	Muhammad Khan	Dogra	Dogra	61.10	GGPS Khan Abdul Qadir	AVP/Contract
2	Komal Begum	Imam Gul	Dogra	Dogra	61.04	GGPS Imam Gul	AVP/Contract
3	Saima	Muhammad Sultan	Dogra	Dogra	61.33	GGPS Imam Gul	AVP/Contract
4	Gulnaz Begum	Imam Khan	Dogra	Dogra	61.26	GGPS Imam Gul	AVP/Contract
5	Saima	Muhammad Khan	Dogra	Dogra	61.22	GGPS Imam Gul	AVP/Contract
6	Shahida	Muhammad Khan	Dogra	Dogra	61.00	GGPS Imam Gul	AVP/Contract
7	Shahida Begum	Muhammad Khan	Dogra	Dogra	60.47	GGPS Imam Gul	AVP/Contract
8	Shahida	Muhammad Khan	Dogra	Dogra	60.21	GGPS Imam Gul	AVP/Contract
9	Saima Akter	Muhammad Khan	Dogra	Dogra	59.84	GGPS Imam Gul	AVP/Contract
10	Azra Gul	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
11	Ais	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
12	Farrukh Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
13	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
14	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
15	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
16	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
17	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
18	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
19	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
20	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
21	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
22	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
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25	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
26	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
27	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
28	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
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42	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
43	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
44	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
45	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
46	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
47	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
48	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
49	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
50	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
51	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
52	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
53	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
54	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
55	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
56	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
57	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
58	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
59	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
60	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
61	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
62	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
63	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
64	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
65	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
66	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
67	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
68	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
69	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
70	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
71	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
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73	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
74	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
75	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
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77	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
78	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
79	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
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83	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
84	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
85	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
86	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
87	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
88	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
89	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
90	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
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92	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
93	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
94	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
95	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
96	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
97	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
98	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
99	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract
100	Shahida Begum	Muhammad Khan	Dogra	Dogra	59.81	GGPS Imam Gul	AVP/Contract

(Signature)
 (S. MUSHARAF HUSSAIN)
 Superintendent
 D/o Proc & Stores
 AMF PAC KAMRA

20/07/20

No.	Name	Grade	Post	Pay Band	Pay Grade	Remarks
1	Abdul	AVPC Control
2	AVPC Control
3	AVPC Control
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98	AVPC Control
99	AVPC Control
100	AVPC Control

3

Signature

(S. MOHAMMAD HUSSAIN)
 Superintendent
 D/o Proc & Stores
 AMF PAC KAMRA

No	Name	Qualification	Experience	Grade	Remarks
1	Yousaf Jamal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
2	Abdul Ghani	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
3	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
4	Faqir Muhammad	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
5	Yousaf Jamal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
6	Muhammad Khan	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
7	Qasim Ali	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
8	Said Ullah	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
9	Yousaf Jamal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
10	Mirza Fakhr	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
11	Shahid Ali	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
12	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
13	Ghulam Qasim	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
14	Zahid Qasim	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
15	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
16	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
17	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
18	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
19	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
20	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
21	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
22	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
23	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
24	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
25	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
26	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
27	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
28	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
29	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
30	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
31	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
32	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
33	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
34	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
35	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
36	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
37	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
38	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
39	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
40	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
41	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
42	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
43	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
44	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
45	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
46	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
47	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
48	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
49	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control
50	Muhammad Iqbal	Labor	1-62	OGPS 3rd Divd. 2nd	AVP/Control

Terms & Conditions:

- These appointments are purely temporary and liable to termination without assigning any reason and without any prior notice.
- They will have to produce Health & Age certificate from the Medical Superintendent DHQ Hospital Swabi before taking over charge.
- In case of both candidates they should not be handed over charge if their age is below 18 or above 35-40 years.
- They must take over charge of the post within 14 days of the issue of the order in which the appointment order will automatically stand cancelled.


(S. MUSHARAF HUSSAIN)
 Superintendent
 Dto of Proc & Stores
 AMF-PAC KAMRA

خارج اورت

ساتھ لسانی و لسانی نظام ستارہ کے کوالر لکھنؤ آڈیٹ لکچر 1997

پتھر 10 20 آئی آر ڈیٹر لکھنؤ ڈیپارٹمنٹ آف ایجوکیشن

دراں میں ڈیپارٹمنٹ کے مطابق ڈیپارٹمنٹ لکھنؤ

کوالر لکھنؤ (لکھنؤ) میں لکھنؤ لکھنؤ

آج لکھنؤ 10 10 آئی آر ڈیٹر لکھنؤ

ساتھ خارج لکھنؤ

خارج لکھنؤ

خارج لکھنؤ

15/10/1997 MISTRESS

Govt. Girls Primary School
No. 2 Ichangira

Sak

(S. MUSHARAF HUSSAIN)
Superintendent
Dte of Proc & Stores
AMF PAC KAMRA

(B)

OFFICE OF THE DIRECTOR SCHOOLS & LITERACY N.W.F.P.

NOTIFICATION.

Consequent upon the approval of the Competent Authority
Post: Saba Gul PST GGPS No.2 Jehangira (Swabi)
is hereby transfer and adjusted at GGPS Ghalla Dher (Nowshera)
against vacant post on her own pay and scale in the interest of Public
Service with effect from the date of her taking over charge.

Notes:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.
3. The Executive District Officers (S&L) concerned are directed to check their original documents before making payment of salaries.
4. Her seniority will be determined at the bottom of his seniority as per rule.
5. She may not be relieved if involved in Election duty.

Director
Schools & Literacy
N.W.F.P, Peshawar.

F.No.:

Encl: No. 4358-64. Dated Peshawar the 2/6 /2007
Copy of the above is forwarded to the:-

1. PS to Honble Minister for Education NWFP, Peshawar.
2. Accountant General N.W.F.P, Peshawar.
3. Executive District Officer (S&L) concerned.
4. District Accounts Officer concerned.
5. Principal/Headmaster/Headmistress concerned. *NSR*
6. Officer/Official concerned.
7. PA to Director Schools & Literacy N.W.F.P, Peshawar.

[Signature]
Deputy Director (Estab :)
Directorate of Schools & Literacy
N.W.F.P, Peshawar

H/M
Ms Ghalla
Dher.

obey the order of the higher authority & hand over charge.

Asst. A. C. 2
By: D. B. G. (S&L)

21-6-
26-6-
4-6

سکول چھوڑنے کا چارج رپورٹ

سجھاؤ صبا گل ڈکن میاں ملا بر شہانہ نے صرف

09 جون 2007 ایگزیکٹو ڈسٹریکٹ آفسر صاحبہ

مدارس و خواندگی ضلع موالی کے مطابق گورنمنٹ

گورنمنٹ پرائمری سکول میں جہانگیرہ سے تبدیل از دور

پرائمری سے اپنے نمبر دے گا چارج چھوڑ دیا

9 جولائی 2007 کو ضلع نوشہرہ - گادین

غلام ڈھیر گورنمنٹ گورنمنٹ پرائمری سکول میں اپنے نمبر

کا چارج سنبھال لیا

چارج لینے والی

چارج دینے والی

مس صبا گل پائی

HEAD MISTRESS
G.G.P. School No 2
JEHANGIRA

HEAD MISTRESS

JEHANGIRA

(S. MUSHARAF HUSSAIN)
Superintendent
Dte of Proc & Stores
AMF PAC KAMRA

09.6.2007



OFFICE OF THE
DISTRICT EDUCATION OFFICER
(FEMALE)
NOWSHERA

Notification

Consequent upon the recommendations of the Departmental Promotion Committee meeting held on-08-02-2013 and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No SO(B&A)/1-18/E&SE/2012 dated 11-07-2012 and Finance Department Endorsement No SO(FRY)FD/10-22(E)/2010 dated 16-07-2012, the following Female Primary School Teacher (PSTs)-B-12 are hereby promoted to the post of Senior Primary School Teachers SPST B-14 (Rs. 8000-611 26300) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with immediate effect and further they will be posted in GGPS/JICAY/GGCMSE Government Girls Primary Schools of the District against the newly upgraded Senior PST BPS-14 posts vacated due to the promotion of 326 SPSTs to PSSTs.

Total No of PST (F) Posts duly verified by the DAO	1325
Share of Senior PST Posts	100
Share of promotion in 2 nd DPC	326
Promoted to the post Senior PST of BPS-14	247
Deferred for Promotion	79

S.No	Serly No	Name of Official	Present place of posting	Date of Birth	Date of Regular Apptt	Remarks
1	626	Tanvir Begum	GGPS Akora Khattak	03/1959	25/08/1999	Will be adjusted/posted according to the rationalization policy
2	627	Naheed Fatima	GGPS Khairabad No.2	01/02/1969	25/08/1998	DO
3	629	Tasleem Begum	GGPS Shah Iran Kor	19/02/1965	01/09/1998	DO
4	632	Taira Javed	GGPS Akbar Pura	12/08/1967	23/09/1998	DO
5	634	Najma Huma	GGPA Azakhel Bala	10/10/1972	15/02/1999	DO
6	679	Nuzhat Gul	GGPS Nokhan	04/1973	22/04/1999	DO
7	640	Rubina Gul	GGPS Gandhari	01/1976	22/04/1999	DO
8	642	Fouzia	GGPS Khudrezai	01/1979	22/04/1999	DO
9	643	Safia Gul	GGPS Dagbesud	03/1980	22/04/1999	DO
10	644	Sadaqat Naz	Holi Khe! NSR Kalan	04/1980	22/04/1999	DO
11	636	Nelofar	GGPS Shekhan No.2	03/1975	23/04/1999	DO
12	645	Meena Gul	GGCMS Kheshgi Payan	08/1976	23/04/1999	DO
13	647	Safia Begum	GGPS D.I.K	01/1978	23/04/1999	DO
14	649	Sadia	CMS Zara Miana	03/1979	23/04/1999	DO
15	651	Jehan Ara	GGPS Mera Jaijoza	07/1970	24/04/1999	DO
16	652	Tahira Jabeen	GGPS Jabi Payan	10/02/1971	24/04/1999	DO
17	654	Bakhmina Bibi	GGPS Qadar Ahad	06/1974	24/04/1999	DO
18	656	Bakhmin Hakim	GGCMS ASC Colony	01/1975	24/04/1999	DO
19	659	Musarat	GGPS No.1 Kheshgi Payan	01/1976	24/04/1999	DO
20	661	Zeenat begum	GGPS D.I.Khel	04/1977	24/04/1999	DO
21	664	Nabila Naz	GGPS Kheshgi Bala	01/1978	24/04/1999	DO
22	665	Iram Bibi	GGPS Kheshgi Bala	01/1978	24/04/1999	DO
23	666	Seeni Khan	GGPS D.I.K	04/1975	24/04/1999	DO

82	756	Waheeda	GGPS Banda mulan Khan	07/06/1979	12/04/2000	DO
83	757	Sarwat Shaheen	GGPS.No.1 Rashakai	30/01/1973	24/04/2000	DO
84	759	Naheed akhtar	GGPS,Shaids No.1	10/02/1976	09/06/2000	DO
85	762	Tasleem Akhtar	GGPS,AD,Center		07/04/2001	DO
86	762 b/17	Naheed	GGPS,Fi, Saq, Kani	05/12/1973	15/08/2001	DO
87	764	Azra begum	GGPS, Badrashi	04/04/1965	10/01/2002	DO
88	765	Farkhanda Naz	GGPS, Shahi Abad	25/03/1978	13/01/2002	DO
89	766	Nasreen Akhtar	GGPS, Bara Banda	14/03/1972	19/01/2002	DO
90	767	Rafaqat Naseem	GGPS Farid Khan Akora	15/03/1970	01/04/2002	DO
91	768 a/439	Neelam Kausar	GGPS, Dhobi, Ghal	07/01/1973	01/04/2002	DO
92	770	Nighat Begum	GGPS, Atlas Abad	27/01/1978	01/04/2002	DO
93	678	Saira Sadaf	GGPS, Dhari Kali Khel No.02	15/01/1978	02/01/2003	DO
94	780	Asma Fareed	GGPS, Shala Khel NSR Kalan	25/01/1978	02/01/2003	DO
95	781 a/787	Farida Naz	GGPS, Patosi Payan	04/12/1975	02/01/2003	DO
96	807	Riasat	GGPS Umare Kili	12/12/1975	02/01/2003	DO
97	781 b/839	Naveeda Rehman	GGPS, Tekedaran	10/01/1980	02/01/2003	DO
98	784	Khalida	GGPS, Badrashi	24/07/1980	02/01/2003	DO
99	781 c/841	Rashda	GGPS, Choki Mumraiz	04/01/1972	03/01/2003	DO
100	778	Safia Jan	GGPS, Abi Khel	03/11/1973	03/01/2003	DO
101	785	Chand Munawer	GGPS, Tandi Abad	04/05/1980	03/01/2003	DO
102	790	Shahnaz Begum	GGPS, Dagai Jadeed 1	09/01/1977	04/01/2003	DO
103	793	Uzma Ayaz	GGPS, Mandar Risalpur	09/08/1981	04/01/2003	DO
104	794	Saeeda	GGPS, Dagbesud	28/03/1979	04/01/2003	DO
105	775	Shehla gul	CMS Zakhi kabristan	04/11/1975	06/01/2003	DO
106	796 a/857	Danish	GGPS, Dagai jaid no. 1	15/01/1977	06/01/2003	DO
107	796	Kaloom	GGPS, Wazir Gan 1	10/03/1978	06/01/2003	DO
108	858	Nagina	GGPS, Ali Baig	27/05/1977	06/01/2003	DO
109	797	Sadiga	GGPS, No.1 Rashakai	25/01/1977	06/01/2003	DO
110	798	Irshad Begum	GGPS, No.1 Rashakai	20/11/1975	06/01/2003	DO
111	840	Yusra	GGPS, Gari momin 1	18/01/1980	06/01/2003	DO
112	801 a/861	Nazia	GGPS, Tarkha			DO
113	801	Seema	GGPS, Dandi			DO
114	802	Majida	GGPS, Hamza Rashaka	02/01/1982	06/01/2003	DO
115	785	Naz Bibi	GGPS, Kander 2	02/02/1982	06/01/2003	DO
116	804 a/862	Nadia	GGPS, No.2 Rashakai	01/01/1983	06/01/2003	DO
117	803	Jasmeen	GGPS, Paitao Payan	04/04/1975	07/01/2003	DO
118	804 c/829	Shaquitta bibi	GGPS, Gul Dhen	29/04/1975	07/01/2003	DO
119	779	Tabassum	GGPS, Shaidu No.1	05/10/1978	07/01/2003	DO
120	807 a/877	Nadia Gull	GGPS, Ali Baig	29/03/1980	07/01/2003	DO
121	800	Sumera	GGPS, Badrashi	02/02/1980	07/01/2003	DO
122	804	Shahzama	GGPS, Kheshti Payan	10/04/1982	07/01/2003	DO
123	805	Gul Meena	GGPS, Badrashi	21/06/1982	07/01/2003	DO
124	804 b/845	Shaista Naz	GGPS, Badrashi	10/11/1983	07/01/2003	DO
125	806	Shabina Hayat	GGCMS, Kheshti Payan	01/01/1975	08/01/2003	DO
126	808	Shaquitta Afshan	GGPS, Salehkhana 2	05/04/1976	08/01/2003	DO
127	809 a/824	Naveed Ahmad	GGPS, Mera Akora	27/09/1976	08/01/2003	DO
128	809 b/847	Noshin	GGPS, Azakhel paye 1	01/01/1978	08/01/2003	DO
129	859	Fazeelat	GGPS, Ali Baig	03/04/1979	08/01/2003	DO
130	809	Fazilat Begum	GGPS, Ziarat Kaka Sb No.1	11/04/1979	08/01/2003	DO
131	813 a/838	Anjuman	GGPS, Azakhel paya no 1	20/11/1980	08/01/2003	DO
132	792	Nadia Akbar	GGPS, Tetara	17/11/1975	08/01/2003	DO
133	812 a/777	Farhat	GGPS, Tetara	04/01/1975	08/01/2003	DO
134	811	Razia Bano	GGPS, Railway Station	10/04/1982	08/01/2003	DO
135	812	Fozia Naz	GGPS, No.2 Kheshti Payan	15/04/1983	08/01/2003	DO
136	813	Rabia Begum	GGCMS, SPIN KANI KHURD	04/01/1972	09/01/2003	DO
137	856	Shazia Husain	GGPS, Shaidu No.1	12/04/1972	09/01/2003	DO
138	814 a/876	Ulfat Begum	GGPS, Sher Garh	01/02/1973	09/01/2003	DO
139	814 b/795	Sana	GGPS, Turlandi	06/01/1974	09/01/2003	DO
140	814	Waheeda Khatoon	GGPS, Seray Kor			DO

141	815	Wanas Begum	GGCMS.SPIN KANI KHURD	01/04/1976	09/01/2003	DO
142	816 a/799	Nuzhal Gul	GGPS Shekhan 2	13/09/1977	09/01/2003	DO
143	781	Saliha Jehan	GGPS Shahab Khel	01/03/1978	09/01/2003	DO
144	821 a/873	Najma	GGPS Azakhel bala 1	01/01/1979	09/01/2003	DO
145	816	Hameeda Begum	GGPS Shahab Khel	01/01/1979	09/01/2003	DO
146	817	Asia Bibi	GGPS Ziarat Kaka Sb No.1	01/04/1979	09/01/2003	DO
147	818	Dilruba	GGPS Adam Zai	02/12/1979	09/01/2003	DO
148	819 a/776	Noshin	GGPS Telara	20/01/1980	09/01/2003	DO
149	819	Seema Begum	GGPS Ziarat Kaka Sb No.2	20/04/1980	09/01/2003	DO
150	820	Nazia Liyaqal	GGPS Ziarat Kaka Sb No.1	07/01/1981	09/01/2003	DO
151	821	Zargha Parveen	GGPS Zando Banda	15/03/1981	09/01/2003	DO
152	822	Nowsheen Rani	GGPS Zando Banda	18/04/1983	09/01/2003	DO
153	823 a/876	Asmal	CMS Azakhelbala mera	06/05/1975	10/01/2003	DO
154	823 b/871	Robina Naz	GGPS Khattak Building	01/06/1977	10/01/2003	DO
155	872	Hina gul	GGPS Muhib banda no 1	04/03/1978	10/01/2003	DO
156	823 c/875	Asma	GGPS Muhib banda no 1	19/11/1979	10/01/2003	DO
157	823 d/874	Mehnaz Sadiq	GGPS Khattak Building	05/04/1980	10/01/2003	DO
158	823	Saima naz	GGPS Khattak Building	27/07/1982	10/01/2003	DO
159	825 a/782	Shamim Bibi	GGPS Hameed Abad Kahi	08/05/1978	11/01/2003	DO
160	825	Shaista	GGPS Akram Abad	01/04/1980	13/01/2003	DO
161	826	Azra Bano	GGPS Saporay	04/04/1982	13/01/2003	DO
162	827	Alia Nasreen	GGPS Qadar Abad	25/03/1977	14/01/2003	DO
163	828	Mumtaz Begum	GGPS Qadar Abad	04/04/1975	18/01/2003	DO
164	829 a/786	Shela Gul	GGPS Shala-Khel NSR Kalan	10/04/1983	19/01/2003	DO
165	829 b/791	Bakhmina	GGPS Maneri	06/04/1980	28/01/2003	DO
166	832	Nasiha Naaz	GGPS Badrashi	21/07/1978	01/02/2003	DO
167	834	Touseef Bibi	GGPS Tekedaran	21/03/1977	01/02/2003	DO
168	335	Ambareen	GGPS Tekedaran	15/06/1977	01/02/2003	DO
169	836	Shakeela	GGPS Ganjmurad 2	04/12/1973	01/02/2003	DO
170	833	Alia	GGPS Muhib banda no 2	22/01/1977	08/02/2003	DO
171	350	Nazia Yunas	GGCMS Hasan Abad	01/12/1981	06/03/2003	DO
172	853	Asia Shali	GGPS Nawan Kati NSR Kalan	06/04/1980	09/03/2003	DO
173	867	Bibi Rashda	GGPS Shaido No.1	02/05/1968	07/07/2003	DO
174	491	Nighal	GGPS Khushmukam	20/03/1974	01/08/2003	DO
175	488	Rehnaqul	Azakhel Bala Mera	01/09/1978	29/02/2004	DO
176	878	Zainab Begum	GGPS Dhoobi-Ghal	25/03/1981	01/07/2004	DO
177	121	Shaqulla Aziz	GGPS Holi-Khel NSR Kalan	08/10/1979	01/08/2004	DO
178	686	Riffat Begum	GGPS Holi-Khel NSR Kalan	15/01/1979	01/08/2004	DO
179	634 a/761	Rakhshanda	GGPS Malik Aman Koroonna	17/03/1976	01/08/2004	DO
180	381	Falak Naz	GGPS Choki Dandi	01/05/1979	01/09/2004	DO
181	887	Shazia Zarin	GGPS Khur Abad-Rashakai	03/08/1979	24/04/2005	DO
182	900 a/910	Kushnud Begum	GGPS Banda Karim	04/11/1976	08/10/2005	DO
183	902	Nazra Taj Muhammad	GGPS Wazir Gari-1	05/05/1981	08/10/2005	DO
184	900	Saiqa	GGPS Patao-Bala	25/6/1974	10/10/2005	DO
185	906	Farzana Yasmin	GGPS Daqbesud	07/12/1979	19/10/2005	DO
186	908	Nasiha Tawas	CMS Rifaqat Abad	04/12/1976	20/10/2005	DO
187	907	Shazia Tabassum	GGPS Saray	03/01/1976	21/10/2005	DO
188	404	Azra Begum	GGPS No.4-Kheshqi Payan	14/02/1982	21/10/2005	DO
189	915 a/852	Shahnaz Qaiser	GGPS No.2-Rashakai	10/03/1983	21/10/2005	DO
190	915	Basmin Sikandar	GGPS Kheshqi Bala	05/04/1983	21/10/2005	DO
191	916	Nusrat shaheen	GGPS Rahimullah Kor.	01/02/1984	21/10/2005	DO
192	867 a/917	Rabia	GGPS Hanilullah Koroonna	16/04/1985	21/10/2005	DO
193	897	Nageena	GGPS Gohar Ali Koroonna	01/01/1973	22/10/2005	DO
194	918	Khalida	GGPS Nandarak	02/02/1973	22/10/2005	DO
195	919 a/884	Rubina Khatoon	GGPS Jallozai-2	01/02/1974	22/10/2005	DO
196	919	Nizam Pari	GGPS Risalpur Ganlli	04/01/1975	22/10/2005	DO
197	919	Nizam Pari	GGCMS WZR GARI	27/04/1977	22/10/2005	DO
			GGPS NSR Canli			

199	921	Salma	GGP	Muhim Lande No 2	22/10/2005	DO
200	923	Kousar Jabeen	GGP	Kana Khet, No. 1	22/10/2005	DO
201	924	Shabnam	GGP	Sado, Khe	22/10/2005	DO
202	1967	Safia Rani	GGP	Zanda Banda	14/12/1980	DO
203	925	Aila	GGP	Jalozai No. 1	22/10/2005	DO
204	926	Nighat Yasmin	GGP	Kahi No.	22/10/2005	DO
205	927	Noreen	GGP	Talkora	22/10/2005	DO
206	928	Asia Naz	GGP	Azeer	22/10/2005	DO
207	928	Farida	GGP	Trakha	22/10/2005	DO
208	929	Aafia	GGP	Gul Abad	22/10/2005	DO
209	930	Shahnaz Begum	GGP	Gul Abad	22/10/2005	DO
210	943	Shahida	GGP	Kotli-Kajan	22/10/2005	DO
211	931	Afshan	GGP	Saodray	22/10/2005	DO
212	933	Basmeen	GGP	Qasim kaly 2	22/10/2005	DO
213	933	Farzana	GGP	Gul Abad	22/10/2005	DO
214	863	Jamila Begum	GGP	Weli Jan Kor	24/10/2005	DO
215	934	Nadina	GGP	Azakhet bata 1	24/10/2005	DO
216	935	Sadia	GGP	Pashoon cari	24/10/2005	DO
217	939	Zakia	GGP	Jahdowndzal	24/10/2005	DO
218	940	Madia Bibi	GGP	Nor. Pun	24/10/2005	DO
219	941	Nabila Akhtar	GGP	Wahid, Bar. No. 3	25/10/2005	DO
220	942	Naseem Akhtar	GGP	Mah. No. 205	25/10/2005	DO
221	943	Tahira Noor	GGP	Adnan Zar	25/10/2005	DO
222	944	Naseem Akhtar	GGP	Danwazgai	25/10/2005	DO
223	945	Zalbi	GGP	S. Akrom Abad	25/10/2005	DO
224	946	Gul Rukh	GGP	Mishr Banda	25/10/2005	DO
225	947	Tahira Naaz	GGP	Mishr Banda	25/10/2005	DO
226	948	Nazia Begum	GGP	Mishr Banda	25/10/2005	DO
227	901	Zubeida Rahman	GGP	Mishr Banda	26/10/2005	DO
228	912	Saira Bibi	GGP	Mishr Banda	26/10/2005	DO
229	950	Zakia Kousar	GGP	Mishr Banda	27/10/2005	DO
230	954	Mehreen Akbar	GGP	Mishr Banda	27/10/2005	DO
231	955	Noor Ul Huda	GGP	Mishr Banda	27/10/2005	DO
232	956	Navab Tabasu	GGP	Siyak	29/10/2005	DO
233	957	Remia	GGP	Bakhai	29/10/2005	DO
234	958	Shariba	GGP	Bakhai	29/10/2005	DO
235	965	Aisana Nigar	GGP	Bakhai	25/10/2006	DO
236	966	Mehnaz	GGP	Bakhai	10/05/2006	DO
237	925	Shabana	GGP	Gulbad Kali	30/05/2006	DO
238	952	Salma Islam	GGP	S. Sagat Abad	01/07/2006	DO
239	998	Abida Bibi	GGP	No. 2 Khechoi Fayan	01/06/2006	DO
240	854	Nicolofar	GGP	IAS Ghais Dher	01/09/2006	DO
241	975	Lubna Begum	GGP	Son Kani Mera	29/12/2006	DO
242	981	Farzana	GGP	Son Kani Mera	15/1/2007	DO
243	982	Pisatal	GGP	Son Kani Mera	02/02/2007	DO
244	969	Shagufta	GGP	Son Kani Mera	02/02/2007	DO
245	989	Pana Gul	GGP	Son Kani Mera	02/02/2007	DO
246	987	Beswar Begum	GGP	Shantiesh, Abad Kahi	02/02/2007	DO
247	991	Nabeela Begum	GGP	Swabi No. 32	02/02/2007	DO

Terms and Conditions:

1. They will be on probation for a period of one year, extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated if the Government is found unsatisfactory during the probation period. In case of resignation, they will be bound by the rules framed from time to time.
4. Charge report should be submitted.
5. Their inter-se seniority on lower posts will be as per the rules.
6. No TADA is allowed for joining in any other organization.
7. They will give an undertaking to record their services in the Government if any one of the above conditions is not fulfilled.

It is therefore prayed that on acceptance of this application the applicant may please be considered for promotion to the Post of Senior Primary School Teacher EP-2-14 w.e 02-03-2013 i.e the date when Juniors to the applicant were promoted as SPST BP-14. The applicant may also be allowed proportional benefits.

Yours Sincerely,

(SABA GUL)
PST Teacher
Govt Girls Primary School,
Risalpur Distt Nowshera
November 2016

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Copy to -

Circle ADO (Female),
Nowshera (Risalpur)

Head Teacher
GOVS HPT
Risalpur

199	921	Sajma	GGP	Mahibunda No 2	22/10/2005	DO
200	922	Kausar Jaboon	GGP	Jana Khaal, K...	22/10/2005	DO
201	924	Shabnam	GGP	Sadda Khaal	22/10/2005	DO
202	1067	Safia Rani	GGPS	Zande Banda	22/10/2005	DO
203	925	Aila	GGPS	Jallozai No. 1	22/10/2005	DO
204	926	Nighat Yasmin	GGPS	Kahli No. 1	22/10/2005	DO
205	927	Norben	GGPS	Jallozai No. 1	22/10/2005	DO
206	930 a/933	Asia Naz	GGPS	Azeem	22/10/2005	DO
207	928	Fanda	GGP	Gulabad	22/10/2005	DO
208	929	Aalia	GGP	Gulabad	22/10/2005	DO
209	930	Shahnaz Begum	GGP	Kotli Kajan	22/10/2005	DO
210	949	Shahida	GGPS	Sadray	22/10/2005	DO
211	931	Aishan	GGPS	Qasim kaly 2	22/10/2005	DO
212	933 a/938	Begmeen	GGPS	Gul Abad	22/10/2005	DO
213	933	Farzana	GGPS	Wali Jan Kor	24/10/2005	DO
214	883	Jamila Begum	GGPS	Azakhe, bala 1	24/10/2005	DO
215	934	Nanina	GGPS	Pashoon cari	24/10/2005	DO
216	935	Sadia	GGPS	Jab Jwondzai	24/10/2005	DO
217	939	Zakia	GGP	Mogri Bari	24/10/2005	DO
218	940	Madia Bibi	GGP	Mogri Bari	24/10/2005	DO
219	941	Nabila Akhtar	GGP	Mogri Bari	25/10/2005	DO
220	942	Naeem Akhtar	GGP	Mogri Bari	25/10/2005	DO
221	943	Talim Naz	GGP	Mogri Bari	25/10/2005	DO
222	944	Naseem Akhtar	GGP	Mogri Bari	25/10/2005	DO
223	945	Zalbi	GGPS	Akram Abad	25/10/2005	DO
224	946	Gul Rukh	GGPS	Mogri Bari	25/10/2005	DO
225	947	Tahira Naaz	GGPS	Mogri Bari	25/10/2005	DO
226	948	Nasib Begum	GGPS	Mogri Bari	25/10/2005	DO
227	901	Zubeda Rannan	GGPS	Mogri Bari	26/10/2005	DO
228	912	Saira Bilal	GGPS	Mogri Bari	26/10/2005	DO
229	950	Zakia Kousar	GGPS	Mogri Bari	27/10/2005	DO
230	954	Mehreen Akbar	GGPS	Mogri Bari	27/10/2005	DO
231	955	Noor Ul Huda	GGPS	Mogri Bari	27/10/2005	DO
232	956	Navab Tabasu	GGPS	Mogri Bari	29/10/2005	DO
233	957	Romia	GGPS	Mogri Bari	29/10/2005	DO
234	958	Shahiba	GGPS	Mogri Bari	25/10/2005	DO
235	955	Aisana Nigar	GGPS	Mogri Bari	25/10/2005	DO
236	956	Mehnaz	GGPS	Mogri Bari	10/05/2006	DO
237	953	Shabana	GGPS	Mogri Bari	30/05/2006	DO
238	952	Saima Islam	GGPS	Mogri Bari	01/07/2006	DO
239	998	Abida Bibi	GGPS	Mogri Bari	01/09/2006	DO
240	854	Neclofa	GGPS	Mogri Bari	29/12/2006	DO
241	975	Lubna Begum	GGPS	Mogri Bari	15/1/2007	DO
242	981	Farzana	GGPS	Mogri Bari	02/02/2007	DO
243	982	Risalat	GGPS	Mogri Bari	02/02/2007	DO
244	983	Shahida	GGPS	Mogri Bari	02/02/2007	DO
245	989	Pana Gul	GGPS	Mogri Bari	02/02/2007	DO
246	987	Basmal Begum	GGPS	Mogri Bari	02/02/2007	DO
247	991	Nabeela Begum	GGPS	Mogri Bari	02/02/2007	DO

Terms and Conditions:

1. They will be on probation for a period of one year commencing from the date of their appointment.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated at any time if the Government is found unsatisfactory during the probation period.
4. Charge report should be submitted.
5. Their inter-se seniority on lower posts will be determined on the basis of their date of appointment.
6. No TA/DA is allowed for joining period.
7. They will give an undertaking to serve the Government for a period of one year from the date of their appointment.

199	921	Selma	GGP	Shahid Banda No 2	22/10/2005	DO
200	922	Kausar Jaboon	GGP	Shahid Banda No 2	22/10/2005	DO
201	924	Shabnam	GGP	Jado Khab	22/10/2005	DO
202	1067	Safia Rani	GGP	Zandee Banua	22/10/2005	DO
203	925	Alia	GGP	Jalloza No 1	22/10/2005	DO
204	926	Niqhat Yasmin	GGP	Kahi No 1	22/10/2005	DO
205	927	Nooreen	GGP	Jalloza No 1	22/10/2005	DO
206	930	Asia Naz	GGP	Azeer	22/10/2005	DO
207	928	Fanda	GGP	Akhara	22/10/2005	DO
208	929	Aafia	GGP	Gul Abad	22/10/2005	DO
209	930	Shahnaz Begum	GGP	Gul Abad	22/10/2005	DO
210	949	Shahida	GGP	Kotli Katan	22/10/2005	DO
211	931	Aishan	GGP	Saparey	22/10/2005	DO
212	933	Basmeen	GGP	Qasim kaly 2	22/10/2005	DO
213	933	Farzana	GGP	Gul Abad	22/10/2005	DO
214	883	Jamila Begum	GGP	Wahlan Kor	24/10/2005	DO
215	934	Nadina	GGP	Azakhe Bala 1	24/10/2005	DO
216	935	Sadia	GGP	Pashkoo ch	24/10/2005	DO
217	939	Zakia	GGP	Jab Dawooda	24/10/2005	DO
218	940	Hadia Bibi	GGP	Kotli Katan	24/10/2005	DO
219	941	Nabila Akhtar	GGP	Shahid Banda No 2	25/10/2005	DO
220	942	Naqem Akhtar	GGP	Shahid Banda No 2	25/10/2005	DO
221	943	Talim Naz	GGP	Amam Zar	25/10/2005	DO
222	944	Noseem Akhtar	GGP	Darwazgai	25/10/2005	DO
223	945	Zaibi	GGP	S. Akram Abad	25/10/2005	DO
224	946	Gul Rukh	GGP	Misri Banda	25/10/2005	DO
225	947	Tehira Naaz	GGP	Shahid Banda No 2	25/10/2005	DO
226	948	Nazim Begum	GGP	Shahid Banda No 2	26/10/2005	DO
227	901	Zubeda Rehman	GGP	Shahid Banda No 2	26/10/2005	DO
228	912	Saira Bibi	GGP	Shahid Banda No 2	27/10/2005	DO
229	950	Zakia Kousar	GGP	Shahid Banda No 2	27/10/2005	DO
230	954	Mehreen Akbar	GGP	Shahid Banda No 2	27/10/2005	DO
231	955	Noor Ul Huda	GGP	S. Shayan	27/10/2005	DO
232	956	Navab Fatmasu	GGP	S. Bakhtiar	27/10/2005	DO
233	957	Rania	GGP	S. Bakhtiar	27/10/2005	DO
234	958	Shahiba	GGP	S. Bakhtiar	27/10/2005	DO
235	965	Aisana Nigar	GGP	S. Bakhtiar	27/10/2005	DO
236	966	Mehmud	GGP	S. Bakhtiar	27/10/2005	DO
237	925	Shabana	GGP	S. Gulbad Kati	27/10/2005	DO
238	962	Salma Islam	GGP	S. Sajad Abad	27/10/2005	DO
239	998	Abida Bibi	GGP	No 2 Khesheh Fayaz	01/08/2006	DO
240	854	Naeelofar	GGP	MS. Ghara Cher	01/09/2006	DO
241	975	Lubna Begum	GGP	S. Khatun Mera	29/12/2006	DO
242	981	Farzana	GGP	S. Khatun Mera	15/1/2007	DO
243	982	Risalat	GGP	S. Khatun Mera	15/1/2007	DO
244	963	Shagufta	GGP	S. Khatun Mera	15/1/2007	DO
245	989	Rana Gul	GGP	S. Khatun Mera	15/1/2007	DO
246	967	Easwar Begum	GGP	S. Khatun Mera	15/1/2007	DO
247	991	Nabeela Begum	GGP	SWabi No 32	15/1/2007	DO

Terms and Conditions:-

1. They would be on probation for one year and may be extended for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated if their performance is found unsatisfactory during the probation period. In case of misconduct, their services may be terminated under the rules framed from time to time.
4. Charge report should be submitted.
5. Their inter-se seniority on the date of appointment shall be as per the rules framed from time to time.
6. No TA/DA is allowed for jointed family.
7. They will give an undertaking to be recorded with the Government to the effect that if any one of them is found to be guilty of any offence, the Government shall not be held liable for the same.

B-14 23 $\frac{5}{15}$

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Promotion order of FST to SPST



OFFICE OF THE DISTRICT EDUCATION OFFICER

(FEMALE) NOWSHERA

Ph: # 0923-9220105

Notification

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt. of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No SO(B&A)/1-18/E&SE/2012 dated 11/7/2012 and Finance Department Endorsement No. SO(FR)/FD/10-22(E)/2010 dated 16/7/2012, the following Female Primary School Teachers (PSTs) B-12 are hereby promoted to the post of Senior Primary School Teachers SPST B-14 (8000-610-26300) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching cadre on the terms and condition given below with immediate effect and further posted in the schools noted against each:-

S. #	Sy. list #	Name of Teacher	Father Name	Date of Birth	Present School	Place of Posting	Remarks
1	3	Rahat Perveen	Muhammad Ashoor	20/01/1957	GGCMS, Pir Pia	GGCMS, Pir Pia	In the same school being senior master
2	7	Nelofer	Muhabat Khan	15/05/1957	GGCMS, Pir Pia	GGCMS, Pir Pia	In the same school being senior master
3	21	Shahnaz Begum	Muhammad Hanif	01/01/1958	GGPS, Zinda Patti	GGPS, Zinda Patti	In the same school being senior master
4	25	Shagufta Naz	Irshadullah	01/01/1968	GGPS, Kabul River	GGPS, Kandar (Risalpur)	In the same school being senior master
5	34	Nasrin Subhani	Ghulam Subhani	05/02/1963	GGPS, Risalpur	GGPS, Risalpur	In the same school being senior master
6	37	Anjum Shaheen	Mir Hassan Khan	24/10/1962	GGCMS, Pir Pia	GGCMS, Pir Pia	In the same school being senior master
7	44	Farzana Shaheen	Abdul Latif	15/11/1968	GGPS, No.01 Nsr Kalan	GGPS, No.01 Nsr Kalan	In the same school being senior master
8	57	Rashida Rani	Ghulam Ali	17/04/1971	GGPS, Meraji Baia	GGPS, Meraji Baia	In the same school being senior master
9	58	Shaheen	Khan Zeb	01/12/1970	GGPS, Hawaii	GGPS, Hawaii	In the same school being senior master
10	65	Nagina Khanum	Havatulillah	21/06/1957	GGPS,	GGPS,	In the same school being senior master

Date of Regular Appointment PST-12

Promotion order of PST to SPST

13	74	Naznin	Daud Khan	02/02/1970	GGPS, No.01 Azakhel Payan	GGCMS, Spin Kani Kalan	In the adjacent circle due to non availability of post in the home UC and home circle.
14	83	Riffat Jehan	Abdul Qudous	25/09/1967	GGCMS, ASC Colony	GGCMS, ASC Colony	In the same school being senior most.
15	89	Fakhrun Nisa	Amanullah	02/02/1970	GGPS, Chowki Mamriz	GGPS, No. 2 Kandi Taza Din	In the same circle
16	96	Kalsoom Begum	Said Mohammad khan	16/08/1965	GGPS, Risalpur cantt:	GGPS, Risalpur cantt:	In the same school being senior most.
17	104	Azra Yasmin	Inayat Hussain	14/09/1964	GGPS, No.1 Khairabad	GGPS, No.1 Khairabad	In the same school being senior most.
18	119	Mumlikat	Fazal Dad	15/04/1970	GGPS, Aman Garh	GGPS, Aman Garh	In the same school being senior most.
19	120	Ashia Bibi	Abdur Raziq	01/01/1971	GGPS, Aba Khel Nsr. Kalan	GGPS, Hoti Khel	In the same circle
20	125	Tasleem Begum	Azeem Khan	14/04/1970	GGPS, D.I.Khel	GGPS, Umar Khan Killi	In the same circle
21	134	Farzana Bibi	Bashir Muhammad	03/12/1969	GGPS, Akbar Pura	GGPS, Garhi Pegham Shah	In the same circle
22	135	Shahzia	Mir Dad Khan	01/04/1970	GGPS, Aman Garh	GGPS, Aman Garh	In the same school being senior most.
23	136	Nagina Bibi	Sajjad Haider	01/06/1971	GGPS, Hamid Abad Kahi	GGPS, Hamid Abad Kahi	In the same school being senior most.
24	139	Aqila Khatoon	Syed Kalim Shah	21/03/1972	GGPS, Tekadaran	GGPS, Khattak Kor.	In the same circle
25	141	Shafaat Begum	Muhammad Shamoon	01/04/1959	GGCMS, ASC Colony	GGPS, ASC Centre	In the adjacent UC
26	145	Anila	Inamullah	06/03/1973	GGPS, Bara Banda	GGPS, Bara Banda	In the same school being senior most.
27	146	Robina Begum	Ali Akbar	05/06/1973	GGPS, Spin Kani Khurd	GGPS, Spin Kani Khurd	In the same school being senior most.
28	147	Alia Khatoon	Umar Hayat	15/12/1974	GGPS, No.2 Azakhel Payan	GGCMS, Spin Kani Kalan	In the adjacent Circle due to non availability of post in the home UC and home circle.
29	151	Farzana Musanif	Mian Musanif Shah	14/03/1974	GGPS, Akbar Pura	GGPS, Ali Beg	In the same circle
30	154	Shabana Bibi	Akhtar Gul	14/08/1976	GGPS, Saadat Abad (zakhi)	GGPS, Balu	In the adjacent UC

Promotion order of PST to SPST

33	168	Bilqis Khatoon	Wali Muhammad	12/02/1975	GGPS, No.1 Azakhel Payan	GGPS, No.2 Spin Kani Kalan	in the adjacent circle due to non-availability of post
34	171	Rukhsana	Faqir Muhammad	05/12/1970	GGPS, Dawa Korun.	GGPS, Dawa Korun.	in the same school
35	173	Mehnaz Gul	Arsala Khan	03/01/1975	GGPS, Nawan Killi	GGPS, Nawan Killi	in the same school being senior most.
36	176	Gul Rukh	Abdul Akbar	01/05/1966	GGCMS, Mandoori	GGPS, Jabbi Payan	in the same UC
37	182	Mehash Bibi	Zaman Khan	10/06/1968	GGPS, Khattak Building	GGPS, Khattak Building	in the same school being senior most.
38	185	Rukhsana	Abdul Wahab	01/12/1970	GGPS, No.3 Pabbi	GGPS, Pabbi-2	in the same UC
39	187	Shabnam Khatoon	Zaibullah Khan	05/04/1976	GGPS, No.1 Azakhel Payan	GGPS, Chowki Drab-2	in the same circle due to non availability of post in home UC & adjacent UC.
40	208	Anjum Begum	S. Izhar Shah	01/12/1977	GGPS, Spin Kani Khurd	GGPS, Spin Kani Khurd	In the same school being senior most.
41	209	Sajida Naseem	Anwar Ahmad	27/01/1978	GGPS, Khat Killi	GGPS, Khat Killi	in the same school being senior most.
42	210	Fozia Kachkol Khan	Kachkoi Khan	05/04/1977	GGPS, Hanifullah Kor.	GGPS, Hanifullah Kor.	in the same school being senior most.
43	211	Dil Ara	Abdul Aziz	15/04/1970	GGPS, Aman Garh	GGPS, Aman Garh	in the same school being senior most.
44	212	Shagufta Naz	Zarduillah Khan	15/04/1973	GGPS, Aman Garh	GGPS, Aman Garh	in the same school being senior most.
45	214	Shaista Hamid	Abdul Hamid	12/04/1975	GGPS, Deri Kati Khel	GGPS, Deri Kati Khel	in the same school being senior most.
46	215	Shabana Irshad	Irshad Ahmad	10/06/1976	GGPS, Khuder Zai	GGPS, Chowki Mamriz	in the adjacent UC
47	218	Ansa	Zahoorul Haq	04/01/1971	GGPS, No.2 Muhib Banda	GGPS, No.3 Muhib Banda	in the same UC
48	220	Zakia Bably	Hidayatullah	06/06/1970	GGPS, Hakim Abad	GGPS, Hakim Abad	in the same school being senior most.
49	221	Nifasat	Umar Gul	05/11/1976	GGPS, Amir Killi	GGPS, Amir Killi	in the same school being senior most.
50	227	Fouzia Naz	Muhammad Ashraf	01/06/1977	GGPS, Aman Kot	GGPS, Aman Kot	in the same school being senior most.
51	231	Farhat Naz	Irshad Mohammad	16/03/1970	GGPS, Chowki Mamriz	GGPS, Chowki Mamriz	in the same school being senior most.
52	233	Yasmin Subhani	M. Ghulam Subhani	03/01/1973	GGPS, Kandar Risalpur	GGPS, Kandar Risalpur	in the same school being senior most.
53	234	Aatira Islam	Muhammad Taybul Islam	01/09/1963	GGPS, Khattak Building	GGCMS, Ismail Khel	in the same circle due to non availability of post in Home and adjacent UC.

Promotion order of PST to SPST

54	241	Aisha Moeen	Moeenullah	20/09/1977	GGPS, ASC centre	GGPS, ASC centre	in the same school being senior most.
55	242	Fahneeda Begum	Haider khan	20/12/1977	GGPS, Narri	GGPS, Narri	in the same school being senior most.
56	244	Sadaf Bibi	Faridul Haq	25/08/1979	GGPS, Sapari Saidan	GGPS, Spin Kani Khurd	in the same UC
57	248	Salma	Raj Wali	01/01/1976	GGPS, No.1 Dagi Jadeed	GGPS, No.1 Dagi Jadeed	in the same school being senior most.
58	249	Bibi Zainab	Ghuncha Gul	12/08/1976	GGPS, Habibullah Kor.	GGPS, Jehangira Deri	in the same circle
59	250	Meena Gul	Misal Khan	12/04/1977	GGPS, Deri Mian ishaq	GGPS, Deri Mian Ishaq	in the same school being senior most.
60	261	Jamila Begum	Said Daud	01/01/1979	GGPS, No.1 Azakhel Payan	GGPS, Chowki Drab-1	in the same circle
61	264	Saira	Israr Badshah	03/08/1980	GGPS, No.2 Pabbi	GGPS, No.2 Pabbi	in the same school being senior most.
62	265	Robina Babar	Wilayat Khan	07/01/1970	GGPS, Khat Killi	GGPS, Khat Killi	in the same school being senior most.
63	268	Saiqa Begum	S. Izhar Shah	19/10/1975	GGPS, Spin Kani Khurd	GGPS, Spin Kani Khurd	in the same school being senior most.
64	271	Shazia	Lal Faraz	01/03/1978	GGPS, Badrashi	GGPS, Badrashi	in the same school being senior most.
65	274	Tajda	Mohammad Ali	16/11/1978	GGPS, Zuo Banda	GGPS, Zuo Banda	in the same school being senior most.
66	277	Safina Hilal	S. Abdullah Shah	12/12/1978	GGPS, No.1 ZKKSb	GGPS, Awan Tangi Khattak	in the same circle
67	282	Asia Perveen	Ghulam Murtaza	01/05/1974	GGPS, No.1 Khairabad	GGPS, Kati Miana	in the same circle
68	287	Sabiha	Mohammad Ghulam	26/02/1978	GGPS, Jabba Taru	GGPS, Babi Qadeem	in the adjacent UC
69	289	Asia Gul	Safdar Shah	06/11/1979	GGPS, Balu	GGPS, Balu	in the same school being senior most.
70	291	Dil Naz	Faizul Manan	20/01/1981	GGPS, Azakhel Payan	GGPS, Chowki Drab 1	in the same circle
71	293	Nafees Khattak	Raees khan	14/03/1976	GGPS, Inzari (Taj Abad)	GGPS, Inzari (Taj Abad)	in the same school being senior most.
72	294	Tasmeen	Abdul Jabbar	05/10/1976	GGPS, Banda Nabi	GGPS, Banda Nabi	in the same school being senior.
73	295	Faiza	Akbar Khan	05/05/1979	GGPS, Dagi Qadeem	GGPS, Dagi Qadeem	in the same school being senior most.
74	296	Bibi Naeema	Salim Khan	01/03/1982	GGPS, Aman Kot	GGPS, Aman Kot	in the same school being senior most.
75	297	Shehla Raees	Raees khan	03/03/1978	GGPS, No.2 Dagi Jadeed	GGPS, Kundi Taza Din-1	in the same circle
76	298	Roheeda Tabasum	Hikmat Shah	21/05/1978	GGPS, Banda Nabi	GGPS, Dagi Qadeem -2	in the same UC
77	299	Shabana	Shamshad	20/04/1979	GGPS, Khuder Zai	GGPS, Chowki	in the same circle

Promotion order of PST to SPST

78	300	Shahla	Razaul Haq	02/03/1979	GGPS, Banda Nabi	GGPS, Kandi Taza Din-1	In the same circle
79	302	Rahat Meena	Mohammad Alif Gul	24/10/1981	GGPS, Aso Khel	GGPS, Aso Khel	in the same school being senior most.
80	303	Rozeena	Qaisar Khan	13/04/1974	GGPS, Khuder Zai	GGPS, Babe Qadeem	in the same circle
81	304	Jehan Ara	Jehan Zeb Khan	06/02/1976	GGPS, Ashor Abad	GGPS, Ashor Abad	in the same school being senior most
82	307	Shagufta	Seyd Ghafar	15/04/1982	GGPS, Sadat Abad	GGPS, Sadat Abad	In the same school
83	308	Haleem Bibi	Nabi Gul	02/02/1980	GGPS, Kutar Pan	GGPS, Kutar Pan	in the same school being senior most.
84	310	Shaheen Akhtar	Lal Zadin	12/08/1971	GGPS, Gaju Khel	GGPS, Gaju Khel	Adjusted in the same school being senior most.
85	311	Samina Mughul	Faqir Hussain	01/01/1980	GGPS, Jammu	GGPS, No.2 Khairabad	In the same circle
86	313	Zakia	Masaib Khan	10/04/1983	GGPS, No.02 Inzari	GGPS, No.02 Inzari	In the same school being senior most.
87	314	Shagufta	Jan Muhammad	01/03/1980	GGPS No.2 Pahar Kati Khel	GGPS No.2 Pahar Kati Khel	In the same school being senior most.
88	315	Nargis	Taj Muhammad	15/01/1982	GGPS, Gul Deri	GGPS, Wattar	In the adjacent circle.
89	316	Farhat Saba	Gul Haider	05/04/1982	GGPS, Qadir Abad	GGPS, Qadir Abad	In the same school being disabled
90	317	Shazia Waheed	Abdul Waheed	31/07/1975	GGPS, No.2 Khairabad	GGPS, No.2 Khairabad	In the same school being senior most.
91	319	Shazia	Hawaladar Khan	25/12/1978	GGPS, No.2 Kana Khel	GGPS, No.2 Kana Khel	In the same school being senior most.
92	320	Amina Begum	Mir Jafar Khan	12/04/1979	GGPS, Aman Pura	GGPS, Aman Pura	In the same school being senior most.
93	321	Khadija Naz	Sheraz Gul	20/06/1979	GGPS, Nizampur	GGPS, Nizampur	In the same school being senior most.
94	322	Fatima Bibi	Naseeb Gul	13/08/1979	GGPS, Meraji Payan	GGPS, Meraji Payan	In the same school being senior most.
95	323	Waheeda Bibi	Samar Gul	01/04/1980	GGPS, Banda Karim	GGPS, Nizampur	In the same circle
96	324	Shazia	Ghunchia Gul	15/10/1983	GGPS, Habibullah Kor.	GGPS, Jehangira Dobandi	In the same circle
97	324	Zubarda Bibi	Ayub Shah	15/04/1980	GGPS, Mian Essa	GGPS, Mughulki	In the same circle
98	326	Ume Kulsoom	Dost Muhammad	16/04/1973	GGPS, Aman Kot	GGPS, Kurvi	In the same circle
99	328	Nazim Subhan	Subhanud Din	03/07/1983	GGPS, Umar Abad Shaidu.	GGPS, Umar Abad Shaidu	In the same school being senior most
100	329	Irum Naz	Janab Gul	03/01/1981	GGCMS, Mandocri	GGPS, Toha	In the same circle
				15/04/1982	GGPS, Gaju	GGPS, Gaju	In the same

Promotion order of PST to SPST

103	334	Zainab	Misal Khan	03/02/1980	GGPS, Shiekhi	GGPS, Shiekhi	In the same school being senior most.
104	335	Shazia Nasrin	Hazrat ud Din	15/02/1975	GGPS, Bahadar Khel	GGPS, Bahadar Khel	In the same school being senior most.
105	336	Samina Naz	Zia ul Haq	16/08/1979	GGPS, No.1 Khairabad	GGPS, Shaheen Abad	In the same circle

Terms and Conditions:-

- 1- They would be on probation for a period of one year extendable for another one year
- 2- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3- Their services can be terminated at any time, in case their performance is found unsatisfactory during probation period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4- Charge report should be submitted to all concerned.
- 5- Their inter se-seniority on lower post will be remain intart.
- 6- No TA/DA is allowed for joining their duty.
- 7- They will give an under taking to be recorded in their service book to the effect that if any over payment is made to her in light of this order will be recovered and if she is wrongly promotrd, she will be reversed.

(Muhammad Inam Toru)
District Education Officer
(Female) Nowshera

Endst.No. 989-95 ____/DEO (F)/Estt.(Pry:)Pro:PSHT/Dated Nsr the 23/05/2015

Copy forwarded for information and necessary action to the:-

1. PS to Secretary E/S Education Khyber Pakhtunkhwa Peshawar
2. Director, E/S Education Khyber Pakhtunkhwa Peshawar
3. Senior District Accounts Officer Nowshera
4. Sub Divisional Education Officer (Female) Nowshera
5. ADEO (F) Estabt. Pry: Local Office
6. Superintendent Establishment Local Office
7. Officials Concerned
8. Master File


District Education Officer
(Female) Nowshera

To

E

Deputy Director (Female)
(E&SE) Khyber Pakhtunkhwa
Peshawar

Subject: - **APPLICATION/COMPLAINT VIOLATION SENIORITY & RULES POLICY**

In respect of: -

1. Kindly refer my application dated 11-12-2015 (Copy attached) and your letter No F.No.32/(F)/Appeal NSR dated 13 January, 2016.
2. It is apprised that action on caption complaint is still in abeyance I am grateful to know that you have processed my application for redress of my grievances. However, more details para wise with reference to my earlier application which may be considered sympathetically and necessary action.
3. Promotion BPS-12 to BPS-14 Notification Promotion BPS-14 No 879-84/DEO (F) Estb Promotion seniority PST dated 02-03-2013 Promotion BPS-14 Violations of Seniority Rules/Policy. In the notification my name was not included while 02 Junior Teachers name was included at S No 246 Baswer Begum and S No 247 Nabeela Begum. Aforesaid in view, I humbly requested that my name at S. No 247 of 2nd DPC dated 02 March 2013 may be added for promotion to BPS-14 with seniority from 02-03-2013 for which I shall remain obliged.
4. In the Notification, 05 PST Teachers (BPS-12) listed at S No 243 to 247 employed in 2007 have been considered for Promotion to BPS-14 which are of my group. It is the responsibility of the Department for issuance of Scale wise Seniority of all teachers every year but there does not exist such a system in Education Department. Had their been a system, none of the individual could have processed their application for redress of grievances.
5. In the Notification 79 Posts were Deferred for Promotion no reason show me. Apart from above, no seniority list has so far been issued to show my seniority.
6. (i) Circle ADO Hameem demanded three sets of my service documents in January, 2013 for 2nd DPC. Promotion BPS-14 with the reason that case was approved by Departmental Promotion Committee and my name was included in the Promotion list.
(ii) It is astonishing that why have I been set a side of Promotion for none of my fault in service assignments or of documentary flaw. I have never been informed by the concerned Quarter for not considering me for the Promotion. It is the responsibility of Circle ADO to ensure that my service book is properly maintained which has been ignored. As per the Educational Standard I am B Ed qualified teacher.
(iii) I asked Circle ADO Hameem as to why my name is not included in the Promotion list. She replied that Departmental Promotion Committee has deferred your name from Promotion but no reason for this deferment was given. Concurrently she advised me to process the application so that your Promotion is made as your file is lying with me and Departmental Promotion Committee has accorded the approval.
(iv) After submission of application to EDO (F) NSR. I met her in the office where circle ADO (F) Faheem Afshan was also present. I explained the matter and EDO (F) NSR advised me to process the application against the circle ADO Hameem for my grievances.

7. I would like to request your honour for holding an **INQUIRY** in to circumstances for depriving me of my due right for Promotion and stem action against the responsibilities for their negligence.

Best regards.

Yours Sincerely,



(**SABA GUL**)
PST Teacher
Govt Girls Primary School
Risalpur, Distt Nowshera

16 February, 2016

Copy forwarded to:

1. PS to
Education Minister,
Elementary & Secondary
Civil Secretariat, Peshawar

: (For information please).

2. PS To
Sectary Elementary & Secondary
Education KPK, Peshawar

: (Sir kindly take necessary action).

To
The Director,
(E&S) Education Department,
Khyber Pakhtunkhwa
Peshawar

In respect of: -

Subject: - **APPLICATION/COMPLAINT VIOLATION SENIORITY & RULES POLICY**

1. Reference your letter No F.No.32 (F) Appeal NSR dated 13 January, 2016 and reminder of even number dated March, 2016 and Complaint Cell KPK Peshawar letter No SO (Comp) E&SED/KPK/1-13/2015/Saba Gul/SE-4160 dated 21 October, 2015. and SO 9Comp) E&SED/KPK/1-7/2015/Saba Gul and Saima Naz dated 23 February, 2016.
2. It is apprised that action on captioned complaint is in abeyance. I would like to request your honour to instruct EDO (F) Nowshera for Compliance of requisite information. Applicant has observed that your Notice for the provision of report has not been regarded by EDO (F) and it is felt that EDO (F) Office, Nowshera has some mighty powers which tempt to disregard your authority. I therefore, suggest that if no reply is furnished, an inquiry at your own level may be ordered to probe the fact.

Best regards.

Yours Sincerely,



(SABA GUL)
PST Teacher
Govt Girls Primary School
Risalpur, Distt Nowshera

04 April, 2016

② Second request
Record Section
Dy.no. 867
4/4/2016

(E)

To
The Honourable
District Education Officer(F) *mail*
Nowshera

Subject:- **Departmental Appeal/Representation against not considering the appellant for promotion to the post Senior Primary School Teacher w.e.f 02-03-2013 i.e the date when juniors to the applicant were promoted as SPST BPS-14 while the applicant has been ignored despite being senior and eligible.**

Prayer in representation:

On acceptance of this appeal/representation the applicant may please be considered for promotion to the Post of Senior Primary School Teacher BPS-14, w.e.f 02-03-2013, as SPST BPS-14, the applicant may also be allowed back/consequential benefits.

Respectfully Submitted:

I respectfully submit my representation for its expunction inter-alia on the following grounds:

1. That the applicant was initially appointed as Primary School Teacher vide order date 20-10-2004, in the Education Department Swabi. I was posted at GGPS No 2 Jahengera (Swabi). I duly took over charge of my post and started performing my duties.
2. That later I was transferred to District Nowshera vide order dated 02-06-2007. I duly took over charge of my new place of posting on 09-06-2007 and started performing my duties. During the course of my service I was also upgraded to BPS-12.
3. That ever since my appointment, I am performing my duties as assigned with zeal and devotion and have never given any change of complaint whatsoever regarding my performance.
4. The the next post in the channel of promotion to the Post of PST BPS-12 is SPST BPS-14. It is pertinent to mention here that in the year 2013, there were 326 posts of Senior Primary School Teachers which were to be filled from amongst the Primary School Teachers.
5. That as per my date of appointment I was will within the promotion zone and was hopeful that I will be promoted.
6. Notification Promotion BPS-14 No 879-84/DEO (F) Estb Promotion seniority PST dated 02-03-2013 Promotion BPS-14 ~~Promotion Seniority BPS-14~~. In the notification my name was not included while 02 Junior Teachers was included at S No 246 and S No 247.
7. In the Notification, 05 PST Teachers (BPS-12) listed at S No 243 to 247 employed in 2007 have been considered for Promotion to BPS-14 which are of my group. Had their been a none of the individual could have processed their application for redress of grievances.

8. In the Notification **79 Posts** were Deferred for Promotion no reason show me. Apart from above, no seniority list has so far been issued to show my seniority.

9. (i) Circle ADO demanded three sets of my service documents in January, 2013 for 2nd DPC. Promotion BPS-14 with the reason that case was approved by Departmental Promotion Committee and my name was included in the Promotion list 2013.

(ii) It is astonishing that why have I been set a side of Promotion for none of my fault in service assignments or of documentary flaw. I have never been informed by the concerned Quarter for not considering me for the Promotion. As per the Educational Standard I am **B Ed** Qualified Teacher.

10. That thereafter another notification dated 23-05-2015, on the basis of date of Birth was issued. 50% of Teachers youngest to me were promoted however, again I was ignored from my due right of promotion. Date of regular joining employment not mentioned.

11. That I submitted an application for the grant of BPS-14 and against the injustice that was done in the promotion cases by promoting junior officials and ignoring seniors, the same was duly forwarded for necessary action vide application dated 21-10-2015. I also made different complaints. Therefore different correspondences were made but to no avail.

12. That as a last resort I am constrained to submit the instant appeal inter alia on the following grounds:

GROUND OF DEPARTMENTAL APPEAL:

(a) That I have not been treated in accordance with law hence my rights secured and guaranteed under the law are badly violated.

(b) That the mandatory provisions of Section 9 of Khyber Pakhtunkhwa (then NWFP) Civil Servant Act, 1973 read with Khyber Pakhtunkhwa (then NWFP) Civil Servant (Appointment, Promotions and Transfer) Rules, 1989 and enabling instructions in the ESTA Code have not been adhered thus the undersigned have been deprived of my legal and due rights.

(c) That no reason whatsoever has been communicated to the undersigned for her deferment. Non consideration from promotion.

(d) That the undersigned was the senior most and was the promotion zone. moreover there were vacancies also available, but quite illegally the undersigned was not denied promotion while juniors to her has been promoted, which is highly illegal unlawful and violative upon the rights of the applicant

(e) That the notification of promotion wherein the applicant has been denied promotion is highly illegal unlawful against the law and facts.

(f) That the performance of the undersigned is up to all standards. During the course of my service, neither I have been proceeded against on any disciplinary ground nor there has been any complaint whatsoever regarding my performance albeit I have been deprived of my due right of promotion.

(g) That the Law never permits that a department should make its employees to suffer for any fault on its part.

(h) That the appellant has a clean and spotless service career at his credit thus deserves to be considered for promotion.

It is therefore prayed that on acceptance of this appeal/representation the applicant may please be considered for promotion to the Post of Senior Primary School Teacher BPS-14, w.e.f 02-03-2013 i.e the date when Juniors to the applicant were promoted as SPST BPS-14, the applicant may also be allowed back/consequential benefits.

Yours Sincerely,


(SABA GUL)
PST Teacher
Govt Girls Primary School,
Risalpur Distt Nowshera

21. November, 2016

Copy to: -

Circle ADO (Female),
Nowshera (Risalpur)


Head Mistress
G.G.P.S No. 1
Risalpur Cantt

21/11/16

"B"

Recd.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Appeal No. *800* of 20 *17*.

M. J. Khan Appellant/Petitioner
Versus

Secretary, Govt of K.P., Peshawar Respondent.
Respondent No. *3*

Notice to:

Director of Public Health, Peshawar
Education (Peshawar) District Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at **8.00 A.M.** If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing **4 copies** of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....*1/4/17*.....

Day of.....*April*.....20 *17*.

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

No. 327

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Name and address of sender	<i>Nowhera</i>		

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

Rejoice

No.

Appeal No. *300* of 20*07*.

Mst. Deepa Singh Appellant/Petitioner

Versus

Secretary, Government of K.P. Peshawar Respondent

Respondent No. *1*

Notice to:

*Distt. Office, Peshawar, P.O. Sec 1011, 1012
Attention: Mr. Malik Distt. Secy.*

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *3-5-07* at 8.00 A.M. If you wish to urge anything against the appellants/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this *1st*

Day of *April* 20*07*

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Appeal No. 200 of 20 17.

Mst. Safia Gul Appellant/Petitioner

Versus

Secretary to Govt of KPK Peshawar Respondent

Respondent No. 2

Notice to: Director Education, KPK Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 5-5-2017 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. _____ dated _____

Given under my hand and the seal of this Court, at Peshawar this 1st.....

Day of April.....2017.

**Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.**

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

6/4/17

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Appeal No. 800 of 20 17

Mst. Safia Gul Appellant/Petitioner

Versus

Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar Respondent

Respondent No. I

Notice to: - Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar

85
2017

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 8/5/2017 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 1/7/17 Day of April 20 17

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Appeal No. 260 of 20 17

Mr. Tabinnola Appellant/Petitioner

Versus

Sect of KPK, through Secretary, Health, etc Respondent

Respondent No. 1

Notice to:

Sect of KPK, through Secretary, Health, Deptt, Civil Sectt, Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 6-5-2017 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No. dated.....

Given under my hand and the seal of this Court, at Peshawar this 12th

Day of April 20 17


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Appeal No. 260 of 20 17.

Mst. Tahmina Appellant/Petitioner

Versus

Director of KMC, through Secretary, Health, Govt. Respondent

Respondent No. 2

Notice to: - Director - General Health Services
Health, Dept. Local Dist. Courts, Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 8-5-2017 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this 18th Day of April, 2017.

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Regd.

Appeal No. *250* of 20 *17*

Mrs. Saeed Gul D/O Mr. J. I. Khan
PST Teacher *Versus* *Dr. S. Raza Khan*
Secretary to Govt of KP, Peshawar
Appellant/Petitioner
Respondent
Respondent No. *3*

Notice to:

Distt. Officer Elementary & Secondary Education (General) Distt. Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *29-07-2017* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No. dated

Given under my hand and the seal of this Court, at Peshawar this *26th*

Day of *July* 20 *17*

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Appeal No. 200

of 20 17

Mst. Sajida Gul Didi
PST Teacher Appellant/Petitioner
Secretary to Govt. KPK Education Respondent
Death benefits

Versus

Respondent No. 1

Notice to: -

Secretary to Govt. of KPK Education
Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 29.8.2017 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 26th

Day of July 20 17.

[Signature]
26/7

[Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Appeal No 200/2017

Saba gulAppellant

VERSUS

Government of Khyber Pukhtunkhwa, & other..... Respondents

INDEX

S.No	Documents	Annexure	Page No
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4		_____	

Deponent

(1)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Appeal No. 200/2017

Saba GulAppellant

VERSUS

Government of Khyber Pukhtunkhwa, & others..... Respondents

Respectively Sheweth

Written comments/reply on behalf of respondent No 1,2,3.

Preliminary Objections

1. That the Appellant has no cause of action/locus stand to file the instant appeal.
2. That this honorable Service Tribunal has got no jurisdiction to entertain the present appeal.
3. That the present Appeal is bad for non-joinder and miss joinder of necessary parties.
4. That the instant appeal is badly time barred.
5. That the appellant has concealed material facts from this Honorable Tribunal.
6. That the appellant is estopped by his own conduct, by deed and by law to file the instant appeal.
7. That the instant appeal is barred by law.

On Facts

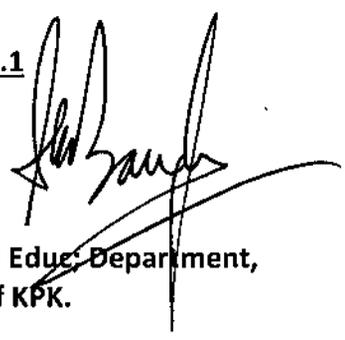
1. Pertains to the record.
2. Pertains to the record.
3. Subject to proof.
4. Pertains to the record.
5. Incorrect. The appellant is at S.NO 427 of the seniority list and the last promotion was at S.NO 335 of the seniority list. The appellant was not in the promotion zone according to the date of her taking over charge in District Nowshera.
6. Correct. The appellant was not in the promotion zone nor was any junior promoted.
7. Incorrect. Candidate at S.NO 246 and 247 were senior to the appellant. (Copy of seniority list is Annexure A.)
8. Incorrect. The appellant was not in promotion zone. The appellant will be considered for promotion on her turn according to the seniority list.
9. Incorrect no junior to the appellant was promoted neither appellant cited them as party.
10. Reply on the ground is as:-

Grounds:

- A. The appellant was treated in accordance with law rules and policy.
- B. Incorrect. The respondent acted in accordance with APT rules 1989.
- C. Incorrect. The appellant was not deferred, rather she was not in the promotion zone.
- D. Incorrect. The appellant was at S.NO 427 of the seniority list and was yet not in the promotion zone.
- E. Incorrect. The appellant will be promoted on the basis of seniority –cum –fitness on her own turn.
- F. Incorrect. The appellant was not superseded on disciplinary grounds but rather she was not in the promotion zone.
- G. Incorrect.
- H. Incorrect. The appellant is not deserving candidate for promotion.

It is therefore, requested before your honor that the present appeal is illegal, against-facts and without force, may kindly be dismissed with cost.

Respondent No.1



Secretary (E&S) Educ. Department,
Govt: of KPK.

Respondent No.2



Director
E & SE Khyber pakhtunkhwa

Respondent No.2



District Education Officer (F)
Nowshera

3

Appeal No 200/2017

Saba gulAppellant

VERSUS

Government of Khyber Pukhtunkhwa, & other.....
Respondents

AFFIDAVIT

I Fayaz Hussain District Education Officer (M/F) Nowshera do solemnly affirmed and declare on oath that the contents of Par wise comments/ reply on behalf of respondent are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.

Deponent



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) NOWSHERA

FINAL SENIORITY LIST OF PST BPS-12(FEMALE) TEACHERS OF ELEM:AND SECY EDUCATION NOWSHERA

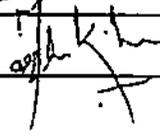
S. #	School Name	Teacher Name	Father's Name	DOMICILE	BPS	Prof; Qualif	D/O Birth	Date of 1st Appt' in Edu;Deptt	Date of Regular Appt' on Present Post	D.O Taking in this Dist;
1	GGPS. Mughal Baz	Zahida Parveen	Ghofran Ud Din	NSR	12	PTC	14/04/1956	01/09/1979	01/09/1979	01/09/1979
2	GGPS Azakhel Bala 1	Younas	Hunar Khan Muhammad Ashoor Khan	NSR	12	PTC	10/07/1958	10/12/1980	10/12/1980	10/12/1980
3	GGCMS. Pir Pai	Rahat Parveen	Wazir Gul	NSR	12	PST	20/01/1957	16/12/1980	16/12/1980	16/12/1980
4	GGPS. No.4 Kheshgi Payan	Shahida Yasmin	Wazir Gul	NSR	12	PTC	13/03/1956	07/07/1981	07/07/1981	07/07/1981
5	GGPS Dairy Mian Ishak	Rashida	Abdul Nabi	PSH	12	PTC	08/11/1955	15/01/1982	15/01/1982	15/01/1982
6	GGPS Banda mulah Khan1	Mumtaz	Abdul Wahid	PSH	12	PTC	18/01/1962	18/01/1982	18/01/1982	18/01/1982
7	GGCMS. Pir Pai	Neelofar	Muhabat Khan	NSR	12	PST	15/05/1959	23/04/1984	23/04/1984	23/04/1984
8	GGPS Dagai kadeem 1	Shagufta	Haji Muhammed	PSH	12	PTC	01/03/1966	11/07/1985	11/07/1985	11/07/1985
9	GGPS. Aba Khel NSR Kalan	Bi Bi Shehnaz	Sultan Muhammad	NSR	12	PST	03/01/1960	25/10/1982	26/10/1982	25/07/1985
10	GGPS Akber pura	Khushna	M/ayub	NSR	12	PTC	14/08/1956	17/10/1982	17/10/1982	20/08/1985
11	GGPS Ali Garh	Zaib-Un-Nisa	Abdul Karim	NSR	12	PTC	15/02/1959	01/11/1982	01/11/1982	20/08/1985
12	GGPS. Nodiah	Shamim akhtar	Kiramal Husain	NSR	12	PTC	14/02/1960	15/11/1979	15/11/1979	20/08/1985
13	GGPS Ali Garh	Zakia	Abdul Karim	NSR	12	PTC	15/04/1960	15/12/1982	15/12/1982	20/08/1985
14	GGPS BaghBan Pura	Khurshed Jahan	Ihsan Ilhai	NSR	12	PTC	26/09/1963	13/04/1981	13/04/1981	20/08/1985

FINAL SENIORITY LIST OF PST BPS-12(FEMALE) TEACHERS OF ELEM. AND SECY EDUCATION NOWSHERA

S. #	School Name	Teacher Name	Father's Name	DOMICILE	BPS	Prof. Qualif	D/O Birth	Date of 1st Appt' in Edu; Dept	Date of Regular Appt' on Present Post	D/O Taking in this Distt;
1	2	3	4	5	6	7	8	9	10	11
241	GGPS,ASC Center	Aisha Moeen	Moeenullah	NSR	12	PST	20/09/1977	22/04/1999	22/04/1999	22/04/1999
242	GGPS,Narai	Fehmeeda Baigum	Haider Khan	NSR	12	CT	20/12/1977	23/04/1999	23/04/1999	23/04/1999
243	CMS Zara Miana	Gulshan	Syed Atzal	NSR	12	PTC	14/05/1978	23/04/1999	23/04/1999	23/04/1999
244	GGPS,Saparay	Sadat Bibi	Fareedul Haq	NSR	12	PST	25/08/1979	23/04/1999	23/04/1999	23/04/1999
245	GGPS,Jallozai No.1	Farida	Waji Muhammad	NSR	12	PTC	20/08/1973	24/04/1999	24/04/1999	24/04/1999
246	GGPS,Ziarat Kaka Sb No.1	Noreen	Sharif Gul	NSR	12	PST	01/04/1975	24/04/1999	24/04/1999	24/04/1999
247	GGPS, Chowki Mamriz	Robina Kifayat	Kifayatullah	NSR	12	PTC	03/09/1975	24/04/1999	24/04/1999	24/04/1999
248	GGPS Dagai Jaid no 1	Salma	Raj wali	NSR	12	PTC	01/01/1976	24/04/1999	24/04/1999	24/04/1999
249	GGPS,Habibullah Kor,	Bibi Zainab	Ghuncha Gul	NSR	12	PTC	12/08/1976	24/04/1999	24/04/1999	24/04/1999
250	GGPS Dairy Mian Ishaq	Meena gul	Misal Khan	NSR	12	PTC	12/04/1977	24/04/1999	24/04/1999	24/04/1999
251	GGPS,Mera Spin Khak	Sadaqat	Mian Sadiq Ullah	NSR	12	PTC	12/12/1977	24/04/1999	24/04/1999	24/04/1999
252	GGPS Nataal	Shazia Amin	Amin Khan	NSR	12	PTC	25/02/1975	29/04/1999	29/04/1999	29/04/1999
253	GGPS,AC Center	Rehana Bibi	Hafiz Ur Rahman	NSR	12	PST	09/12/1962	24/02/1986	24/02/1986	11/05/1999
254	GGPS Tetara	Bismeen	Musharaf Khan	NSR	12	PTC	20/11/1970	12/10/1988	12/10/1988	15/05/1999
255	GGPS Marhahi No 2	Nighat Begum	Zila Muhammad	NSR	12	PTC	10/10/1969	18/11/1989	18/11/1989	31/05/1999

FINAL SENIORITY LIST OF PST BPS-12(FEMALE) TEACHERS OF ELEM-AND SECY EDUCATION NOWSHERA

S. #	School Name	Teacher Name	Father's Name	DOMICILE	BPS/Prof. Qualif	D/O Birth	Date of 1st Appt' in Edu/Deptt	Date of Regular Appt' on Post	D.O Taking In this Distt:
1									
2									
421	GGPS, Jaroba	Roshada	Sawab Din	NSR	12	PTC	01/02/1981	09/02/2007	09/02/2007
422	GGPS, Batazkai	Najma Begum	Said Muhammad	NSR	12	PTC	20/02/1981	09/02/2007	09/02/2007
423	CMS Azakhehala mera	Zahida naz	Abdul hadi	NSR	12	PTC	30/04/1982	02/09/2007	02/09/2007
424	GGPS, Talabad Inziri	Sabha taj	Taj Muhammad	NSR	12	PTC	16/12/1984	02/09/2007	02/09/2007
425	GGPS, Khudrezai	Nazakat	Gulam habib	NSR	12	PTC	17/01/1981	02/10/2007	02/10/2007
426	GGCMS, Azam Abad	Uzma Baigum	Zia ud din	NSR	12	PTC	01/03/1983	02/10/2007	02/10/2007
427	GGPS, Risalpur cantt.	Saba Gul	Milan Tahir Shah	Swabi	12	PTC	08/07/1974	21/10/2004	21/10/2007
428	GGPS, Nodialh	Robina Shafiq	Muhammad Shafiq	NSR	12	PTC	07/03/1981	02/12/2007	02/12/2007
429	GGPS no 1 manhal	Waziat Bibi	Yaqoob Khan	NSR	12	PTC	05/12/1984	10/02/2007	10/03/2008
430	GGPS Iraq Abad	Bushra Begum	Sheikh Noor Muhammad	NSR	12	PTC	01/02/1979	01/03/1993	01/03/1993
431	GGPS, Pir Shaq No. 1	Rubina Sultan	Faithur-Rehman	MKND	12	PTC	01/04/1972	01/09/1993	01/09/1993
432	GGPS Chokimunnairz	Saima Tabasum	Salahuddin	NSR	12	PTC	05/11/1981	22/11/2004	22/11/2004
433	GGPS, Banda Chit	Zeenat Mehel	Inayatullah	Dir	12	PTC	04/02/1975	04/02/1995	04/02/1995
434	GGPS, ASC Center	Ghazala	Anwar Khan	MDN	12	PST	31/03/1970	19/09/1988	19/09/1988
435	GGPS, Khairabad No.2	Safina Bibi	Muhammad Azam	PSH	12	PTC	02/07/1968	27/04/1993	27/04/1993

50	59698			
ایڈوکیٹ: 		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر:		رابطہ نمبر: 0345-9108099		

بعدالت جناب: سر سید محمد نواز

متجانب:	دعوی:
SABAGUL BIDI	علت نمبر:
بنام	مورد:
Govt	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام Peshawar کیلئے FARHAN TARIQ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف 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 یکطرفہ 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 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوائے 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

المقام: 12-19-18
 المبادیٰ كواہ شد المبادیٰ
 المقام PESHAWAR کے لیے منظور ہے۔

صاحب وقت

Accepted
 H. Kh

①

BEFORE THE HONBLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR.

Service appeal No. 200/2017

Saba Gul Vs Secretary Government
of KPK and others

REJOINDER FOR/ON BEHALF OF APPELLANT TO THE
COMMENTS OF RESPONDENTS

Respectfully sheweth:

That the subject appeal is pending adjudication before this Hon'ble Tribunal wherein it is fixed for hearing on 08-04-019. The rejoinder to comments is as under

On Preliminary objections

The objections so raised, appear to have been raised for the sake of mere objections. Those who have committed illegalities/excesses often fall back upon such like extraneous excuses/ objections. The comments as laid in misconceived and misleading, mutually contradictory besides. Not only the appellant is possessed with ample cause of action / locus standi to file and proceed with the instant appeal but the same being an appeal for promotion is maintainable on all scores, furthermore, the appeal in hand is well within time as well and thus this Honble Court has ample jurisdiction to entertain and adjudicate upon, the instant matter.

Further more, the plaintiff has not made any concealment while instituting the instant appeal rather it's the respondents who are concealing real facts and are all out to deprive the appellant from her right of promotion despite the fact that appellant was in promotion zone but for reasons completely unknown juniors to the present appellant were promoted and Appellant was/ is completely ignored.

On Facts

1-4 That Para 1 to 4 of the appeal are correct and the record completely supports the claim of the Appellant. It is further added that Appellant was appointed as PST on 21-10-04 at Jehangira

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and took over charge at District Nowshera on 09-06-2007 while the respondents have promoted others candidates junior to the appellant. The same is evident from the seniority list annexed with the comments of respondents. The employees at serial No. 246 and 247 are juniors to the present appellant. Copy of the arrival report is annexed with the rejoinder.

- 5-7 **Incorrect while that of the appeal are correct.** Bare perusal of the arrival report of the Appellant would make it crystal clear that the appellant was/ is senior to the employees at serial No. 246 and 247. Appellant was in promotion zone and should have been promoted but for reasons completely known to the respondents the appellant was ignored completely and juniors to the appellant were promoted.
8. Para 8 of the appeal is correct. While that of the comments is incorrect
9. Para 9 of the comments is incorrect while that of the appeal are correct. It is respectfully submitted that record already annexed with the appeal and comments clearly shows that the appellant was/ is senior to the employees promoted and are available at serial No 246 and 247. To this effect a number complaints were also made by the appellant but they were ignored showing the malafide intentions of the respondents.

ON GROUNDS

- A. Ground A of the appeal is correct while that of comments is incorrect. The Appellant has not been dealt in accordance with law and has been deprived of her legal right of promotion.
- B. Ground B of the appeal is correct.
- C. Misleading. The appellant was eligible to be promoted and initially she was informed that she is in promotion zone but later on for unknown reasons she was ignored and other junior employees were promoted which is completely against the law and rules.
- D. Incorrect. The seniority list available on file is incorrect as the arrival report shows that the appellant took charge on 09-06-07 while according to the seniority list her arrival date has been shown as 21-10-07 which is incorrect and has been made with the intention to deprive the appellant of her due right. Copy of the seniority list is attached.
- E-G Incorrect.

- H. Incorrect and denied with full force. The appellant deserves to be promoted on merit while ignoring her would not only deprive her from her legal right but is also against the law. Appellant has a spotless career and deserves promotion while respondents are not following the rules and law.

It is, therefore, prayed that on acceptance of this rejoinder, the subject appeal may kindly be allowed.

Appellant

Through

FARHAN TARIQ
Advocate, Peshawar

Verification

Verified that the contents of the rejoinder are true and correct .

OFFICE OF THE DIRECTOR SCHOOLS & LITERACY N.W.F.P.

NOTIFICATION.

4

Consequent upon the approval of the Competent Authority
Mst. Saba Gul PST GGFS No. 2 Jehangira (Swabi)
is hereby transfer and adjusted at GGCMS Ghalla Dher (Nowshera)
against vacant post on her own pay and scale in the interest of Public
Service with effect from the date of her taking over charge.

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.
3. The Executive District Officers (S&L) concerned are directed to check their original documents before making payment of salaries.
4. Her seniority will be determined at the bottom of his seniority as per rule.
5. She may not be relieved if involved in Election duty.

Director
Schools & Literacy
N.W.F.P, Peshawar.

F.No.

4358-64

Endst: No. Dated Peshawar the: - 2/6/2007

Copy of the above is forwarded to the:-

1. PS to Honble Minister for Education NWFP, Peshawar.
2. Accountant General N.W.F.P, Peshawar.
3. Executive District Officer (S&L) concerned.
4. District Accounts Officer concerned.
5. Principal/Headmaster/Headmistress concerned. *NSR*
6. Officer/Official concerned.
7. PA to Director Schools & Literacy N.W.F.P, Peshawar.

[Signature]

Deputy Director (Estab :)
Directorate of Schools & Literacy
N.W.F.P, Peshawar

H/M

Mst Saba Gul
Dher.

obey the order of the higher authority & hand over charge.

not in acct 2
By: *[Signature]*
Dy. D.O. (ET)
PESHAWAR

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GS&PD-NWFP-1072 P.S.-2000 P. of 100-30-9-96-(4)

CERTIFICATE OF TRANSFER OF CHARGE

1. Certified that we on this day respectively made over and received charge of the office of the MSE, Saba Gul, P.S.T. G.G.C.M.S. Ghala Dhera, NWFP. Vide; D.S.G.L. Pesh. Encl. No. 4359-64 Dated Pesh. 2/6/07.
2. Particulars of all important secret and confidential documents handed over are noted on the reverse.

Signature of relieved Government servant Vacant Post

Designation _____

Station G.G.C.M.S. Ghala Dhera, NWFP

Signature of relieving Government servant Saba Gul

Designation P.S.T

Dated 09/06/07

Forwarded to the Dy. Commr. D.S.G.L. NSR in triplicate for onward transmission to the quarters concerned.

No. 3 Dtd. 9/6/07

[Signature]
Head Office
G.G.C.M.S.
Ghala Dhera (NWFP)

(ATTACHED)

[Signature]
(S. MUSHARAF HUSSAIN)
Superintendent
Dte of Proc & Stores
AMF PAC KAMRA

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) NOWSHERA

FINAL SENIORITY LIST OF PST BPS-12(FEMALE) TEACHERS OF ELEM:AND SECY EDUCATION NOWSHERA

S.#	School Name	Teacher Name	Father's Name	DOMICILE	BPS	Prof. Qualif	D/O Birth	Date of 1st Appnt' in Edu:Deptt	Date of Regular Appnt' on Present Post	D.O Taking in this Disty
1	GGPS Mughal Baz	Zahida Parveen	Ghofran Ud Din	NSR	12	PTC	14/04/1956	01/09/1979	01/09/1979	01/09/1979
2	GGPS Azakhel Bala 1	Younas	Hunar Khan	NSR	12	PTC	10/07/1958	10/12/1980	10/12/1980	10/12/1980
3	GGCMS Pir Pai	Rahat Parveen	Muhammad Ashraf Khan	NSR	12	PST	20/01/1957	16/12/1980	16/12/1980	16/12/1980
4	GGPS.No.4 Kheshti Payan	Shahida Yasmin	Wazir Gul	NSR	12	PTC	13/03/1956	07/07/1981	07/07/1981	07/07/1981
5	GGPS Dairy Mian Ishak	Rashida	Abdul Nabi	PSH	12	PTC	08/11/1955	15/01/1982	15/01/1982	15/01/1982
6	GGPS Banda mulah Khan1	Munilaz	Abdul Wahid	PSH	12	PTC	18/01/1962	18/01/1982	18/01/1982	18/01/1982
7	GGCMS Pir Pai	Neelofar	Muhabat Khan	NSR	12	PST	15/05/1959	23/04/1984	23/04/1984	23/04/1984
8	GGPS Dagai kadem 1	Shagufta	Haji Muhammed	PSH	12	PTC	01/03/1966	11/07/1985	11/07/1985	11/07/1985
9	GGPS.Aba Khel NSR.Kalan	Bi Bi Shehnaz	Sullan Muhammed	NSR	12	PST	03/01/1960	25/10/1982	26/10/1982	25/07/1985
10	GGPS Akber pura	Khushna	M/ayub	NSR	12	PTC	14/08/1956	17/10/1982	17/10/1982	20/08/1985
11	GGPS Aii Garhi	Zaib-Ul-Nisa	Abdul Karim	NSR	12	PTC	15/02/1959	01/11/1982	01/11/1982	20/08/1985
12	GGPS Nodiah	Shamim akhtar	Kiramal Husain	NSR	12	PTC	14/02/1960	15/11/1979	15/11/1979	20/08/1985
	PPS Aii Garh	Zakia	Abdul Karim	NSP	12	PTC	15/04/1960	15/12/1982	15/12/1982	20/08/1985
			Insan Ilhali	NSR	12	PTC	26/09/1963	13/04/1981	13/04/1981	20/08/1985

FINAL SENIORITY LIST OF PST BPS-12(FEMALE) TEACHERS OF ELEM-AND SECY EDUCATION NOWSHERA

S. #	School Name	Teacher Name	Father's Name	DOMICILE	BPS/Prof. Qualif	D/O Birth	Date of 1st Appt' in Edu; Deptt	Date of Regular Appt' on Present Post	D.O Taking in this Distt
12									
241	GGPS,ASC Center	Aisha Moseen	Moenuallah	NSR	12	PST 20/09/1977	22/04/1999	22/04/1999	22/04/1999
242	GGPS, Narai	Fehmeeda Baigum	Haider khan	NSR	12	CT. 20/12/1977	23/04/1999	23/04/1999	23/04/1999
243	CMS Zara Miana	Gulshan	Syed Atzal	NSR	12	PTC 14/05/1978	23/04/1999	23/04/1999	23/04/1999
244	GGPS, Sagaray	Sadal Bibi	Fareedul Haq	NSR	12	PST 25/08/1979	23/04/1999	23/04/1999	23/04/1999
245	GGPS, Jalozai No.1	Faride	Wali Muhammad	NSR	12	PTC 20/08/1973	24/04/1999	24/04/1999	24/04/1999
246	GGPS Ziarat Kaka Sb No.1	Noreen	Sharif Gul	NSR	12	PST 01/01/1975	24/04/1999	24/04/1999	24/04/1999
247	GGPS, Chowki Manniriz	Robina Khatayal	Khatayallah	NSR	12	PTC 03/09/1975	24/04/1999	24/04/1999	24/04/1999
248	GGPS, Dagai Jadid no 1	Salma	Raj wali	NSR	12	PTC 01/01/1976	24/04/1999	24/04/1999	24/04/1999
249	GGPS, Habibullah Kor,	Bibi Zainab	Chuncha Gul	NSR	12	PTC 12/08/1976	24/04/1999	24/04/1999	24/04/1999
250	GGPS, Dairy Mian Ishaq	Meeena gul	Misal Khan	NSR	12	PTC 12/04/1977	24/04/1999	24/04/1999	24/04/1999
251	GGPS, Mera Spin Khak	Sadaqat	Mian Sadig Ullah	NSR	12	PTC 25/02/1975	29/04/1999	29/04/1999	29/04/1999
252	GGPS, Nalaal	Shazia Amin	Amin Khan	NSR	12	PST 09/12/1962	24/02/1986	24/02/1986	11/05/1999
253	GGPS, AC Center	Rehana Bibi	Haifz Ur Rahman	NSR	12	PTC 20/11/1970	12/10/1988	12/10/1988	15/05/1999
	GGPS, Telara	Bismeen	Musharal Khan	NSR	12	PTC 10/10/1969	18/11/1989	18/11/1989	31/05/1999
	Mahatall No 2	Nighat Begum	Zila Khatammad	NSR	12	PTC 10/10/1969	18/11/1989	18/11/1989	31/05/1999

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FINAL SENIORITY LIST OF PST BPS-12(FEMALE) TEACHERS OF ELEMENTARY AND SECY EDUCATION NOWSHERA										
School Name	Teacher Name	Father's Name	DOMICILE	BPS Prof. Qualif.	O/O Birth	Date of 1st Appnt in Edu Dept	Date of Regular Appnt on Present Post	O.O Taking in this Distt		
12										
421	GGPS, Jaroba	Roshada	NSR	12	PTC	01/02/1981	09/02/2007	03/02/2007		
422	GGPS, Balakzai	Najira Begum	NSR	12	PTC	20/02/1981	09/02/2007	03/02/2007		
423	CMS Azakhetkhal mera	Zahida naz	NSR	12	PTC	30/04/1982	02/09/2007	02/09/2007		
424	GGPS, Tajabad Inari	Sabha Inari	NSR	12	PTC	15/12/1984	02/09/2007	02/09/2007		
425	GGPS Khudrezai	Nazakat	NSR	12	PTC	17/01/1981	02/10/2007	02/10/2007		
426	GGPS Azam Akhad	Uzma Baqum	NSR	12	PTC	01/03/1963	02/10/2007	02/10/2007		
427	GGPS, Risalpur cantt	Saba Gul	NSR	12	PTC	09/07/1974	02/10/2007	02/10/2007		
428	GGPS, Hodiak	Robina Shaq	NSR	12	PTC	07/03/1981	02/10/2007	02/10/2007		
429	GGPS no. 1 madhali	Wazial Baji	NSR	12	PTC	05/12/1964	10/02/2007	10/02/2007		
430	GGPS Inq Akhad	Bushra Begum	NSR	12	PTC	01/02/1973	01/03/1998	01/03/1998		
431	GGPS Pir Sbaq No. 1	Rubina Sulhan	NSR	12	PTC	01/04/1972	01/03/1993	01/03/1993		
432	GGPS Choki Mumraiz	Saima Tabassum	NSR	12	PTC	05/11/1981	22/11/2004	22/11/2004		
433	GGPS, Banda Chil	Zeenal Mehel	NSR	12	PST	04/02/1975	04/02/1995	04/02/1995		
434	GGPS ASC Center	Ghazala	NSR	12	PST	31/03/1970	15/09/1998	15/09/1998		
435	GGPS Khairabad Ho 2	Safaa Baji	NSR	12	PTC	02/07/1968	27/04/1993	27/04/1993		

Handwritten signature and stamp area with a circular official seal.

Handwritten number 9

سید الشہاب سروس ٹریڈنگ کمپنی

دفتر سولہ مارچ (پانچویں منزل)

صبا گل ٹیکسٹائل

پیر کی طرف صفا میں عبداللہ لکھنوی میں آج

نمبر 28/8/19 میں جو

کونڈیشن میں ہے۔ یہ سب سے پہلے اس میں
بتا دیا کہ اس موقع پر 28/8/19 کو عبداللہ لکھنوی میں
میں لکھنوی سے کال میں ہے۔

پیر کی طرف سے صفا میں عبداللہ لکھنوی میں
نمبر 28/8/19 کو عبداللہ لکھنوی میں
کیزا فرانس میں عبداللہ لکھنوی میں
نمبر 28/8/19 کو عبداللہ لکھنوی میں

28/8/19

ندیم گل
28/8/19

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

D.B

No.

APPEAL No. 200 of 2017

R.S.D

Saba Gul

Appellant/Petitioner

Versus

Secy ESS E Kpt Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner

Saba Gul D/o Mian Tahir
Shah PST Teacher Govt. Girls Primary
School Risalpur Distt. Nowshera

Take notice that your appeal has been fixed for Preliminary hearing replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 13/03/2020 at 9:00 AM at Peshawar.

You may, therefore, appear before the Tribunal on the said date and at aid place either personally or through an advocate for presentation of your case line which your appeal shall be liable to be dismissed in default.

M. J. [Signature]
Registrar,
Khyber Pakhtunkhwa Service Tribunal
Peshawar.

C.P.

BEFORE THE SERVICE TRIBUNAL
PESHAWAR.

CM No. _____/2019

IN

Case. No. _____

In Appeal;

Saba Gul

V/S

Govt. Etc

APPLICATION FOR PLACING ON
FILE THE ADDITIONAL DOCUMENTS
ON BEHALF OF PETITIONER.

RESPECTED SHEWETH:-

- 1) That the above titled appeal is pending arguments before this Hon'ble Tribunal which is fixed for 12.11.2019.
- 2) That the applicant / petitioner wants to place on record the attached documents which are annexure "A to G" for the proper assistance to this Hon'ble Tribunal.
- 3) That the placing on file of annexed documents will not only be in the interest of justice but will also secure the interest of

petitioner, proper assistance to the Hon'ble Tribunal besides.

- 4) That the attached documents are in regard to the subject matter and will provide sufficient assistance to the Hon'ble Tribunal in reaching to the just decision.

It is therefore, very humbly prayed that on acceptance of instant application this Hon'ble Tribunal may kindly be pleased to allow the placing on record of annexed documents.

Dated: 12/11/2019

Petitioner

Through

F. Khan

FARHAN TARIQ
Advocate Peshawar.

بخدمت جناب ڈپٹی سیکرٹری ایجوکیشن آفیسر صاحبہ (زونا ۱) ڈسٹرکٹ نوشہرہ
بوساطت: ادارہ گورنمنٹ گرلز پرائمری سکول رسالپور کینٹ

"A"

درخواست برائے پمیل BPS-14 برطابق 2nd DPC بموجب نوٹیفیکیشن

نمبر:- DEO(F)/8-879 مورخہ 02-03-13

1- منجہ سہ ماہ صبا گل BPS-12 کھسیت پرائمری سکول ٹیچر گورنمنٹ گرلز پرائمری سکول رسالپور کینٹ میں تعینات
ہوں اور فرائض منصبی احسن طریقے سے سرانجام دے رہی ہوں۔

2- 2 مارچ 2013ء کو معاملات کی ترقی کا نوٹیفیکیشن نمبر:- DEO(F)/8-879 نمبر جاری کیا گیا جس میں فدیہ کی
سنیاری کو نظر انداز کر کے 2 جونیہ پیپر کو BPS-14 میں ترقی دے دی گئی۔

فدیہ کی تعیناتی کی تاریخ 02-06-2007 ہے جبکہ معطلہ بصورتیگی کی تعیناتی کی تاریخ 02-07-2007 اور معطلہ
نیلیہ بیگم کی تعیناتی تاریخ فدیہ سے جوئیر ہیں۔

مذکورہ بالا 2nd DPC کے مطابق سریل نمبر:- 246 پر ترقی دلانے کی حقدار ہوں لہذا تعیناتی کی تاریخ
07-06-07 کے مطابق سریل نمبر:- 46 پر فدیہ کو ترقی دی جائے۔

جناب عالی!

گزارش قابل غور کہ مذکورہ بالا عنوان کی روشنی میں ایک سینیئر معطلہ کی ترقی کو نظر انداز کیا گیا جبکہ جوئیر معاملات کو ترقی دے
کر فدیہ کی حق تلفی کی گئی۔

لہذا ان کوائف وحقائق کو مد نظر رکھتے ہوئے فدیہ کی 2nd DPC کے سریل نمبر:- 246 پر BPS-14 میں ترقی
دلانے کے احکامات صادر فرما کر مشکور و ممنون فرمادیں۔

ارض

No reply to this
application was re-
ceived to appellant
بالی ٹون۔

درخواست تاریخ 08-10-2015

مسماة صبا گل PST گورنمنٹ گرلز پرائمری سکول رسالپور کینٹ
پرسنل نمبر 00342405

Headmistress
G.G.P.S Risalpur Cantt.
Distt: Nowshera

D.E.O. (F) Nowshera

Diary No. 1075

Dated 14-10-2015

۱۔ پی۔ ایس ڈی سیکرٹری ایجوکیشن آفیسر، خیبر پختونخوا، پشاور
۲۔ ڈائریکٹوریٹ آف ایجوکیشن، خیبر پختونخوا، پشاور
۳۔ سینیئر ڈسٹرکٹ اکاؤنٹنٹ آفیسر، نوشہرہ
۴۔ سب ڈائریکٹریٹ ایجوکیشن آفیسر، نوشہرہ

(HUSSAIN)

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"B"

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9223540

No. SO(Corap)JE&SED/KPK/1-13/2015/Saba Gul/S.F.-1160

Dated October 21st, 2015

To

The District Education Officer (F),
Nowshera

Subject: APPLICATION/COMPLAINT

I am directed to refer to the subject noted above and to enclose herewith an application/complaint received from Mst. Saba Gul PST, GGPS Risalpur Cantt., Nowshera for necessary action as per rules/policy.

Encl: As Above:

(NASRULLAH)
SECTION OFFICER (COMPLAINT)

Endst. of even number & date:

Copy of the above, is forwarded to the Mst. Saba Gul PST, GGPS Risalpur Cantt., Nowshera w/r to his letter referred to above.

(Signature)
SECTION OFFICER (COMPLAINT)

(S. MISHRAJ HUSSAIN)
Superintendent
Dte of Primary & Secondary Education
AMF PAF 1015224

"C"

To,

Education Minister,
Khyber Pakhtunkhwa,
Peshawar Secretariat

Through Proper Channel

Subject: APPLICATION / COMPLAINT
VIOLATION SENIORITY & RULES/ POLICY

Sir,

- 1) With due respect it is submitted that an application for up graduation to BPS-14 from Ms. Saba Gul PST, GGPS Risalpur was processed to DEO (F) Nowshera vide Civil Secretariat Peshawar Letter NO. So (Comp) E & SED/KPK/1-13/2015/Saba Gul/S.E 4160 dated 21 October, 2015.
- 2) It is apprised that action on Captioned complaint is still in abeyance.
- 3) I would like to request your honour for holding an inquiry into circumstances for depriving me of my due right for up graduation and stern action against the responsibilities for their negligence. I also request that orders may also be issued for my up graduation to BPS-14 please for which I shall remain obliged.

Yours Sincerely

Head Mistress
G.G.P.S No.
Risalpur Cantt
12-12-15

Dis is for urgent me as denied by the H.M. Eshtp.

(SABA GUL)
PST BPS-12
Govt Girls Primary School,
Risalpur Cantt
0300 5722320

11 December, 2015

Copy to:

1. PS to Secretary
Elementary and Secondary Education KPK, Peshawar.
2. Dte of Elementary and Secondary Education KPK, Peshawar.

→ *As Raza Khan - phone no. 091-9210389*

Dy no 1792 dt 29-12-2015

marked to Additional Secretary Director, KPK

dated 30-12-2015 - Add. Dir phone no 92-11775

To

Education Minister,
Khyber Pakhtunkhwa,
Peshawar Secretariat

Reminder

"D"

Through Proper Channel

Sir,

Subject: - **APPLICATION / COMPLAINT**

1. With due respect it is submitted that an application for up gradation to BPS-14 from Mst Saba Gul PST, GGPS Risalpur was processed to DEO (F) Nowshera vide Civil Secretariat Peshawar letter No. So (Comp) E&SED/KPK/1-13/2015/Saba Gul/S.E 4160 dated 21 October, 2105.
2. It is apprised that action on Captioned Complaint is still in abeyance.
3. I would like to request your honour for holding an inquiry into circumstances for depriving me of my due right for up gradation and stern action against the responsible for their negligence. I also request that orders may also be issued for my up gradation to BPS-14 please for which I shall remain obliged.

Yours Sincerely,

(SABA GUL)
PST BPS-12
Govt Girls Primary School,
Risalpur Cantt

December, 2015

Copy to: -

1. PS to Secretary,
Elementary and Secretary Education,
KPK, Peshawar
2. Dte of Elementary Account Officer,
Nowshera
3. Senior District Account Officer,
Nowshera
4. District Education Officer (F),
Nowshera
5. Sub Divisional Educational Officer,
Nowshera

To

Deputy Director (Female)
(E&SE) Khyber Pakhtunkhwa
Peshawar

"E"

Subject:- **APPLICATION/COMPLAINT VIOLATION SENIORITY & RULES POLICY**

In respect of: -

1. Kindly refer my application dated 11-12-2015 (Copy attached) and your letter No F.No.32/(F)/Appeal NSR dated 13 January, 2016.
2. It is apprised that action on caption complaint is still in abeyance I am grateful to know that you have processed my application for redress of my grievances. However, more details para wise with reference to my earlier application which may be considered sympathetically and necessary action.
3. Promotion BPS-12 to BPS-14 Notification Promotion BPS-14 No 879-84/DEO (F) Estb Promotion seniority PST dated 02-03-2013 Promotion BPS-14 Violations of Seniority Rules/Policy. In the notification my name was not included while 02 Junior Teachers name was included at S No 246 Baswer Begum and S No 247 Nabeela Begum. Aforesaid in view, I humbly requested that my name at S. No 247 of 2nd DPC dated 02 March 2013 may be added for promotion to BPS-14 with seniority from 02-03-2013 for which I shall remain obliged.
4. In the Notification, 05 PST Teachers (BPS-12) listed at S No 243 to 247 employed in 2007 have been considered for Promotion to BPS-14 which are of my group. It is the responsibility of the Department for issuance of Scale wise Seniority of all teachers every year but there does not exist such a system in Education Department. Had their been a system, none of the individual could have processed their application for redress of grievances.
5. In the Notification 79 Posts were Deferred for Promotion no reason show me. Apart from above, no seniority list has so far been issued to show my seniority *at that time*.
6. (i) Circle ADO Hameem demanded three sets of my service documents in January, 2013 for 2nd DPC. Promotion BPS-14 with the reason that case was approved by Departmental Promotion Committee and my name was included in the Promotion list.
(ii) It is astonishing that why have I been set a side of Promotion for none of my fault in service assignments or of documentary flaw. I have never been informed by the concerned Quarter for not considering me for the Promotion. It is the responsibility of Circle ADO to ensure that my service book is properly maintained which has been ignored. As per the Educational Standard I am B Ed qualified teacher.
(iii) I asked Circle ADO Hameem as to why my name is not included in the Promotion list. She replied that Departmental Promotion Committee has deferred your name from Promotion but no reason for this deferment was given. Concurrently she advised me to process the application so that your Promotion is made as your file is lying with me and Departmental Promotion Committee has accorded the approval.
(iv) After submission of application to EDO (F) NSR. I met her in the office where circle ADO (F) Faheem Afshan was also present. I explained the matter and EDO (F) NSR advised me to process the application against the circle ADO Hameem for my grievances.
7. I would like to request your honour for holding an **INQUIRY** in to circumstances for depriving me of my due right for Promotion and stem action against the responsibilities for their negligence.

(SABA GUL)
PST Teacher

February, 2016

To

The Sectary (E&SE), KPK
Civil Secretariat, Education Deptt,
Peshawar

"F"

In respect:-

Subject: - **APPLICATION/COMPLAINT VIOLATION SENIORITY & RULES POLICY**

1. Kindly refer my following correspondence on the subject matter: -

- Notification 2nd DPC 879-84/DEO/(F)Estb dated 02-03-2013 Violation S No 246 and 247. Flag "A"
- Application to Distt EDO (F) NSR Diary No 1075 dated 08-10-2015 Flag "B"
- Complaint Cell letter No SO (Comp) E&SED/KPK/1-13/2015 Saba Gul/SE-4160 dated 21-10-2015 Flag "C"
- Application to H Minister E&SE endorsed to Dir E&SE, Peshawar dated 26-10-2015 Flag "D"
- Dy Dir Education letter No 32 (F) Appeal NSR dated 13-01-2016 Flag "E"
- Application Para wise details S No 1 to S No 7 marked to Dy Dir (F) Peshawar dated _____-02-2016 Flag "F"
- SO (Comp) E&SED/KPK/1-7/2015/Samia Naz and Saba Gul PST dated 23-02-2016 Flag "G"
- My 2nd Request Diary No 867 dated 04-04-2016 addressed to Dir Education Peshawar Flag "H"
- My 3rd Request dated 27-04-2016 addressed to Dir Education Peshawar. Post Office Registration No 490 dated 27-04-2016. Flag "J"

2. It is apprised that action on captioned complaint is in abeyance. I would like to request your honour to instruct EDO (F) Nowshera for Compliance of requisite information. Applicant has observed that your Notice for the provision of report has not been regarded by EDO (F) and it is felt that EDO (F) Office, Nowshera has some mighty powers which tempt to disregard your authority. I therefore, suggest that if no reply is furnished, an **INQUIRY** at your own level may be ordered to probe the fact.

3. Above situation in view, it is noticed that your kind office has twice directed the Director E&S Education for compliance for redress of my grievances but the channels in line seem to have ignored your kind orders in all or adopted a bureaucratic attitude for fulfilment of requisite action.

4. Foregone in view, it is humbly requested your honour to intervene the matter personally and I may please be given remedy with extended **Justice** and **Rule** of **Laws**. Your act of kindness will certainly not only relive me from the mental worries but also enable me to perform my duties with more dedications and devotions.

Best regards.

Yours Sincerely,

(SABA GUL)
PST Teacher
Govt Girls Primary School
Risalpur, Distt Nowshera

May, 2016

Encl: As stated

Copy to:-

1. Directorate of E&SE KPK
Peshawar
2. Deputy Director (Female)
(E&SE) KPK Peshawar Refer your File letter No 32 (F) appeal/NSR
dated 13-01-2016
3. District EDO (F), Nowshera Ref my application Dy No 1075 dated 14-10-15

To

The Sectary (E&SE) KPK
Block "A" Civil Secretariat,
Peshawar

"G"

In respect:-

Subject: - **APPLICATION/COMPLAINT VIOLATION SENIORITY & RULES POLICY**

1. Kindly Reference my application dated 08 October, 2015 addressed to Education Director (F) Nowshera for violation of my promotion to BPS-14 vide Notification No. 879-84/DEO (F) dated 02 March, 2013 and Copy to your office.
2. Your kind office had sent my application to complaint cell which was further communication to DEO (F) Nowshera for necessary action with a copy to applicant. The action on this issue is still in abeyance since 21-10-2015. Being violated for my just right, I processed another application to Education Minister KPK on 11-12-2015 with a copy to your office also. My application was marked to Dir E&S Education Peshawar on 26-12-2015 for urgent necessary action. Deputy Director (F) KPK Peshawar directed DEO (F) Nowshera on 13-01-2016 for submission of detailed report within 07 days vide letter No. _____ which has not been complemented so far.
3. Indicating the back Ground of my case I approached DD (F) E&S Education Peshawar dated ___-02-2014 for seeking help through an inquiry to Probe the facts for depriving me of my due right but there is no response so far inspite of Direction of complaint cell to Direct E&S Education Peshawar vide letter of 23-02-2016 (All letters enclosed).
4. Above situation in view, it is noticed that your kind twice has notice Directed the Director E&S Education for compliance for redress of my grievances but the channels in line seem to have your kind order totally ignored or adopted an bureaucratic attitude for fulfilment of requisit action. This has mentally disturbed me and I am of the opinion that concerned Education department has some mighty powers which tempt to disregard your authority. I therefore, suggest that if no reply is furnished, an inquiry at your own level may be ordered to probe the fact.

Best regards.

Yours Sincerely,

(SABA GUL)
PST Teacher
Govt Girls Primary School
Risalpur, Distt Nowshera

May, 2016

Ecnl: As stated

Copy to:-

1. Directorate of E&SE KPK
Peshawar
2. Deputy Director (Female)
(E&SE) KPK Peshawar
3. District Education officers
Female Nowshera

A

BEFORE THE HON'BLE SERVICE TRIBUNAL
KPK PESHAWAR

CM No. _____/2022

In Re:

Appeal No. 200/17

Saba Gul
VERSUS
Govt of KPK etc

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Application for place on file		1-2
2.	Copies of all relevant documents	A to G	3-11

Applicant
Through


FARHAN TARIQ
ADVOCATE, Peshawar

21

BEFORE THE SERVICE TRIBUNAL
PESHAWAR.

CM No. _____ /20 22

IN

Case No. _____
In Appeal;

Saba Gul

V/S

Govt. Etc

APPLICATION FOR PLACING ON
FILE THE ADDITIONAL DOCUMENTS
ON BEHALF OF PETITIONER.

RESPECTED SHEWETH:-

- 1) That the above titled appeal is pending arguments before this Hon'ble Tribunal which is fixed for 27-6-2022
- 2) That the applicant / petitioner wants to place on record the attached documents which are annexure "A to G" for the proper assistance to this Hon'ble Tribunal.
- 3) That the placing on file of annexed documents will not only be in the interest of justice but will also secure the interest of

12

petitioner, proper assistance to the Hon'ble Tribunal besides.

- 4) That the attached documents are in regard to the subject matter and will provide sufficient assistance to the Hon'ble Tribunal in reaching to the just decision.

It is therefore, very humbly prayed that on acceptance of instant application this Hon'ble Tribunal may kindly be pleased to allow the placing on record of annexed documents.

Dated: 24-6-2022

Petitioner

Through

afzal
FARHAN TARIQ
Advocate Peshawar.

App. No. 76
App. No. 3

Annex "A"

بخدمت جناب ڈپٹی کمشنر ایجوکیشن ایف ایس آر ایس صاحبہ (زنانشہ) ڈسٹرکٹ نوشہرہ
بوساطت: ادارہ گورنمنٹ گریڈ پرائمری سکول رسالپور کینٹ

درخواست برائے حصول BPS-14 برطابق 2nd DPC بموجب نوٹیفیکیشن

نمبر:- 879-84/DEO(F) مورخہ 02-03-13

1- منکہ مسماۃ صبا گل BPS-12 محشیٹ پرائمری سکول ٹیچر گورنمنٹ گریڈ پرائمری سکول رسالپور کینٹ میں تعینات
ہوں اور فرائض منصبی احسن طریقے سے سرانجام دے رہی ہوں۔

2- 2 مارچ 2013ء کو معلومات کی ترقی کا نوٹیفیکیشن نمبر:- 879-84/DEO(F) نمبر جاری کیا گیا جس میں فدیہ کی
سنیاری کو نظر انداز کر کے 2 جوئیہ ٹیچر کو BPS-14 میں ترقی دے دی گئی۔

فدیہ کی تعیناتی کی تاریخ 02-06-2007 ہے جبکہ معطلہ بصورتیگی جسکی تعیناتی کی تاریخ 02-07-2007 اور معطلہ
نبیلہ بیگم جسکی تعیناتی تاریخ فدیہ سے جوئیہ ہیں۔

مذکورہ بالا 2nd DPC کے مطابق سریل نمبر 246 پر ترقی دلانے کی ہدایت ہوں لہذا تعیناتی کی تاریخ
02-06-07 کے مطابق سریل نمبر 246 پر فدیہ کو ترقی دی جائے۔

گزارش قابل غور کہ مذکورہ بالا عہدہ کی روشنی میں ایک سینیئر معطلہ کی ترقی کو نظر انداز کیا گیا جبکہ جوئیہ معطلہ کو ترقی دے
کر فدیہ کی حق تلفی کی گئی۔

لہذا ان کوائف وحقائق کو مد نظر رکھتے ہوئے فدیہ کی 2nd DPC کے سریل نمبر 246 پر BPS-14 میں ترقی
دلانے کے احکامات صادر فرما کر مستور و منوں فرمادیں۔

درخواست تاریخ 08-10-2015

Headmistress
G.G.P.S Risalpur Cantt.
Distt: Nowshera

D.E.O. (F) Nowshera
Diary No. 1075
Dated 14-10-2015

ارض
مسماۃ صبا گل PST گورنمنٹ گریڈ پرائمری سکول رسالپور کینٹ
پرسنل نمبر 00342408

No reply to this
application was
received to appeal
بالی ٹو۔

1- پی۔ ایس ڈی ایف ایس آر ایس ایڈمنسٹریٹو آفیسر، خیبر پختونخوا، پشاور
2- ڈائریکٹوریٹ آف ایڈمنسٹریٹو آفیسر، خیبر پختونخوا، پشاور
3- سینیئر ڈسٹرکٹ اکاؤنٹس آفیسر، نوشہرہ
4- سب ڈائریکٹوریٹ ایجوکیشن آفیسر، نوشہرہ

(OF HUSSAIN)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9223540

No. SO(Comp.)E&SED/KPK/1-13/2015/Saba Gul/S.E-4160

Dated October 21st, 2015

To

The District Education Officer (F),
Nowshera.

Subject: - APPLICATION/COMPLAINT

I am directed to refer to the subject noted above and to enclose herewith an application/complaint received from Mst Saba Gul PST, GGPS Risalpur Cantt., Nowshera for necessary action as per rules/policy.

Encl: As Above:

(NASRULLAH)
SECTION OFFICER (COMPLAINT)

Encls: of even number & date:

Copy of the above is forwarded to the Mst. Saba Gul PST, GGPS Risalpur Cantt., Nowshera w/r to his letter referred to above.

(Signature)
SECTION OFFICER (COMPLAINT)

App. 7
Rule

Annex B

(5)

To,

Education Minister,
Khyber Pakhtunkhwa,
Peshawar Secretariat

Through Proper Channel

Subject: APPLICATION / COMPLAINT
VIOLATION SENIORITY & RULES/ POLICY

Sir,

- 1) With due respect it is submitted that an application for up graduation to BPS-14 from Mrs. Saba Gul PST, GGPS, Risalpur was processed to D:EO (F) Nowshera vide Civil Secretariat Peshawar Letter NO. So (Comp) E & SED/KPK/1-13/2015-Saba Gul/S.E 4160 dated 21 October, 2015.
- 2) It is appised that action on Captioned complaint is still in abeyance.
- 3) I would like to request your honour for holding an inquiry into circumstances for depriving me of my due right for up graduation and istern action against the responsibilities for their negligence. I also request that orders may also be issued for my up graduation to BPS-14 please for which I shall remain obliged.

Yours Sincerely

Head Mistress
G.G.P.S No.
Risalpur Cantt
12-12-15

*For urgent mls
as denied by
the H.M. Risalpur*

(SABA GUL)
PST BPS-12
Govt Girls Primary School,
Risalpur Cantt
0300 5722320

December, 2015

Copy to:

1. PS to Secretary
Elementary and Secondary Education KPK, Peshawar
2. Dte of Elementary and Secondary Education KPK, Peshawar.

→ La Rozat Khan - phnu-no. 091-9210329

Dy. No 1792. dtl 29-12-2015

marked to Additional ~~Secy~~ Director, KPK

dated 30-12-2015 - Add. Div phnu no 92-11775

App. 7
Sub

Annex "C"

16

Reminder

To

Education Minister,
Khyber Pakhtunkhwa,
Peshawar Secretariat

Through Proper Channel

Sir,

Subject: - APPLICATION / COMPLAINT

1. With due respect it is submitted that an application for up gradation to BPS-14 from Mst Saba Gul PST, GGPS Risalpur was processed to DEO (F) Nowshera vide Civil Secretariat Peshawar letter No. So (Comp) E&SED/KPK/1-13/2015/Saba Gul/S.E 4160 dated 21 October, 2105.
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3. I would like to request your honour for holding an inquiry into circumstances for depriving me of my due right for up gradation and stern action against the responsible for their negligence. I also request that orders may also be issued for my up gradation to BPS-14 please for which I shall remain obliged.

Yours Sincerely,

(SABA GUL)
PST BPS-12
Govt Girls Primary School,
Risalpur Cantt

December, 2015

Copy to: -

1. PS to Secretary,
Elementary and Secretary Education,
KPK, Peshawar
2. Dte of Elementary Account Officer,
Nowshera
3. Senior District Account Officer,
Nowshera
4. District Education Officer (F),
Nowshera
5. Sub Divisional Educational Officer,
Nowshera

App. 7
Sub

Annex D

To

Deputy Director (Female)
(E&SE) Khyber Pakhtunkhwa
Peshawar

(7)

Subject:- **APPLICATION/COMPLAINT VIOLATION SENIORITY & RULES POLICY**

In respect of: -

1. Kindly refer my application dated 11-12-2015 (Copy attached) and your letter No F.No.32/(F)/Appeal NSR dated 13 January, 2016.
2. It is apprised that action on caption complaint is still in abeyance I am grateful to know that you have processed my application for redress of my grievances. However, more details para wise with reference to my earlier application which may be considered sympathetically and necessary action.
3. Promotion BPS-12 to BPS-14 Notification Promotion BPS-14 No 879-84/DEO (F) Estb Promotion. seniority PST dated 02-03-2013 Promotion BPS-14 Violations of Seniority Rules/Policy. In the notification my name was not included while 02 Junior Teachers name was included at S No 246 Baswer Begum and S No 247 Nabeela Begum. Aforesaid in view, I humbly requested that my name at S. No 247 of 2nd DPC dated 02 March 2013 may be added for promotion to BPS-14 with seniority from 02-03-2013 for which I shall remain obliged.
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7. I would like to request your honour for holding an **INQUIRY** in to circumstances for depriving me of my due right for Promotion and stem action against the responsibilities for their negligence.

(SABA GUL)
PST Teacher

February, 2016

AP

A

(8)

Amma "E"

To

The Sectary (E&SE), KPK
Civil Secretariat, Education Deptt,
Peshawar

In respect:-

Subject: - APPLICATION/COMPLAINT VIOLATION SENIORITY & RULES POLICY

1. Kindly refer my following correspondence on the subject matter: -

- Notification 2nd DPC 879-84/DEO/(F)Estb dated 02-03-2013 Flag "A"
Violation S No 246 and 247.
- Application to Distt EDO (F) NSR Diary No 1075 dated 08-10-2015 Flag "B"
- Complaint Cell letter No SO (Comp) E&SED/KPK/1-13/2015 Flag "C"
Saba Gul/SE-4160 dated 21-10-201
- Application to H Minister E&SE endorsed to Dir E&SE, Peshawar Flag "D"
dated 26-10-2015
- Dy Dir Education letter No 32 (F) Appeal NSR dated 13-01-2016 Flag "E"
- Application Para wise details S No 1 to S No 7 marked to Dy Dir (F) Flag "F"
Peshawar dated ____-02-2016
- SO (Comp) E&SED/KPK/1-7/2015/Samia Naz and Saba Gul PST Flag "G"
dated 23-02-2016.
- My 2nd Request Diary No 867 dated 04-04-2016 addressed to Dir Flag "H"
Education Peshawar
- My 3rd Request dated 27-04-2016 addressed to Dir Education Flag "J"
Peshawar. Post Office Registration No 490 dated 27-04-2016.

2. It is apprised that action on captioned complaint is in abeyance. I would like to request your honour to instruct EDO (F) Nowshera for Compliance of requisite information. Applicant has observed that your Notice for the provision of report has not been regarded by EDO (F) and it is felt that EDO (F) Office, Nowshera has some mighty powers which tempt to disregard your authority. I therefore, suggest that if no reply is furnished, an **INQUIRY** at your own level may be ordered to probe the fact.

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APP

(9)

4. Foregone in view, it is humbly requested your honour to intervene the matter personally and I may please be given remedy with extended **Justice** and **Rule of Laws**. Your act of kindness will certainly not only relive me from the mental worries but also enable me to perform my duties with more dedications and devotions.

Best regards.

Yours Sincerely,

(SABA GUL)
PST Teacher
Govt Girls Primary School
Risalpur, Distt Nowshera

May, 2016

Ecnl: **As stated**

Copy to:-

1. Directorate of E&SE KPK
Peshawar
2. Deputy Director (Female)
(E&SE) KPK Peshawar Refer your File letter No 32 (F) appeal/NSR
dated 13-01-2016
3. District EDO (F), Nowshera Ref my application Dy No 1075 dated 14-10-15



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

KHYBER PAKHTUNKHWA, PESHAWAR

Phone: 091-9210938, E-mail: complaintcellese@gmail.com

Annex

MOST IMMEDIATE:

No. 1174 /File: Nowshera V-III/Complaint Cell/2016

FINAL REMINDER

Dated Peshawar the 25/8/ 2016

To

District Education Officer,
(Female) Nowshera.

LA

Subject: - **EXPLANATION.**

Reference this office letter No. 81 dated 23/06/2016 on the subject cited above.

You are once again directed to explain your position to why not providing seniority list /rules to the complainant.

The same may be furnished to this office immediately through special messenger for own ward submission to high ups, failing which you will be held responsible for the same.

[Signature]
4-195/18/16
Deputy Director (Estab)F
Directorate of E&SE KPK

Endst No. _____/

Copy forwarded to the: -

- 1:- Section Officer Complaint E&SE Department Khyber Pakhtunkhwa Peshawar.
- 2:- PA to Director E&SE Khyber Pakhtunkhwa, Peshawar.
- 3:- Master File.

Deputy Director (Estab)F
Directorate of E&SE KPK

Shelba

D.E.O. (F) Nowshera

Diary No. 1256

Dated 29.8.16

Received *[Signature]*

26.8.16