

9.11.2022

Since 9th November has been declared as public holiday, case is adjourned to 05.01.2023 for the same as before.

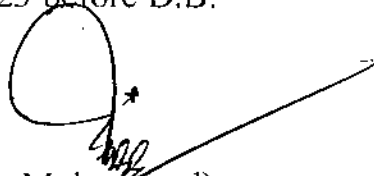

Reader


05.01.2023

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Last opportunity is granted. Adjourned. To come up for arguments on 06.04.2023 before D.B.

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ar


(Mian Muhammad)
Member (E)


(Kalim Arshad Khan)
Chairman

25.07.2022

Appellant present through counsel.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Arshad Ali ADEO for respondents present.

Perusal of preceding order sheet dated 30.05.2022 would reveal that pre-admission notices were issued to the respondents for submission of comments and preliminary hearing. As per record, notices were issued to the respondents on 23.07.2022, therefore, a request was made for adjournment in order to produce comments as well as the entire relevant record including seniority list of SPST (BS-14). Last chance is given. To come up for reply/comments as well as preliminary hearing on 27.09.2022 before S.B.

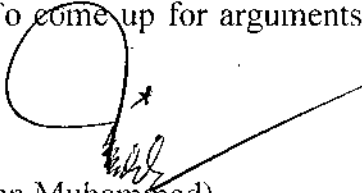

(Rozina Rehman)
Member (J)

27.09.2022

Husband of the appellant on behalf of appellant present. Mr. Nasser-Ud-Din Shah, Assistant Advocate General alongwith Mr. Arshad Khan ADEO (Litigation) on behalf of respondent No. 3 present.

Written reply/comments on behalf of respondents No. 3 submitted which are placed on file. Reply/comments on behalf of respondents No. 1 & 2 are still awaited.

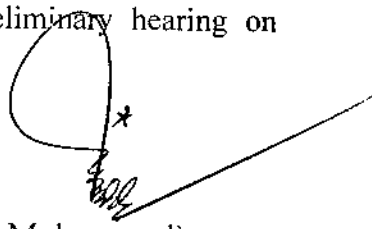
On previous order sheet, last opportunity was granted to respondents for submission of reply/comments but even today, respondents No. 1 & 2 failed to submit their written reply/comments, therefore, the right of submission of written reply/comments of respondent No. 1 & 2 stands struck off. To come up for arguments before the D.B on 09.11.2022.


(Mian Muhammad)
Member (E)

30.05.2022

Mr. Noor Muhammad Khattak, Advocate for the appellant present.
Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant was initially appointed against the post of PJC on 14.01.1982. She was serving as SPST (BS-14) at GGPS Civil Quarter when retired from service on attaining the age of superannuation w.e.f. 19.01.2020, vide retirement order dated 05.04.2021. She is aggrieved of the impugned order dated 25.02.2021 and 17.06.2021 when her other colleagues and erstwhile juniors were promoted from the post of SPST (BS-14) to the post of PSHT (BS-15). Her departmental appeal dated 30.06.2021 was not responded within the statutory period whereafter the instant service appeal has been filed in the Service Tribunal on 29.10.2021. On a question from the Bench where is the seniority list of SPST (BS-14) to establish and ascertain seniority of the appellant vis-a-vis those promoted vide the impugned orders? Learned counsel for the appellant admitted that no such seniority list is appended with the service appeal and it would be appropriate to ask the respondents to produce the same before the court. In view of the contention of the learned counsel for appellant it deems appropriate to issue pre-admission notices to the respondents before provisionally admitting the service appeal for regular hearing. To come up for written reply/comments as well as preliminary hearing on 25.07.2022 before S.B.

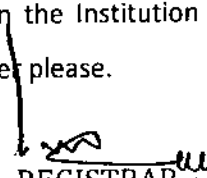




(Mian Muhammad)
Member (E)

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FORM OF ORDER SHEET

Court of _____

Case No.- 7729/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/11/2021	<p>The appeal of Shahwar Begum resubmitted today by Mr. Noor Muhammad Khattak 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-		<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>03/01/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	03.01.2022	<p>Junior to counsel for the appellant present and requested for adjournment due to non-availability of learned senior counsel. Request accorded. To come up for preliminary hearing on 01.03.2022 before S.B.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J)</p>
	1-3-2022	<p>Due to retirement of the Honorable Chairman the case is adjourned to come up for the same as before on 30/5/2022</p> <p style="text-align: right;"> Reader</p>


SCANNED
 KP ST
 Peshawar

The appeal of Shahwar Begum, W/O Tehsin Ullah Khan, SPST (BPS-14) (Rtd), GGPS, Civil Quarters Peshawar, R/O House no. 36C5/C, Civil Quarters, District Peshawar received today i.e. on 29.10.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Index of the appeal is not attached with the appeal.
2. Memorandum of the appeal is unsigned which may be signed by the appellant.
3. Checklist is not attached with the appeal.
4. Appeal has not been flagged/marked with annexure marks.
5. Annexures of the appeal may be attested.
6. Affidavit attested by the Oath Commissioner is not attached with the appeal.
7. Copy of correspondence dated 25/09/2021 mentioned in para-5 of memo of the appeal is not attached with the appeal which may be placed on it.
8. Annexures A, D, E & F attached with the appeal are illegible which may be replaced by legible/better one.
9. Para-6 of memo of the appeal is not related with the appeal of the appellant.
10. Wakalat Nama in favor of appellant is not attached with the appeal.
11. Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.


No. 2157 /S.T,

Dt. 29/10 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv.
Highcourt Peshawar.

- All the objection has properly been removed.
- R-submitted pleas


05/11/2021

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: **SHAHWAR BEGUM** V/S **EDUCATION DEPTT:**

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: NOOR MOHAMMAD KHATTAK	✓	
2	Whether Counsel/Appellant/Respondent/Deponents have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____		
26	Whether copies of comments/reply/rejoinder submitted? On _____		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: **NOOR MOHAMMAD KHATTAK**

Signature: _____

Dated: 2021

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

SERVICE APPEAL NO. 7729 /2021

SHAHWAR BEGUM V/S EDUCATION DEPARTT;

I N D E X

S.N	DOCUMENTS	ANNEXURE	PAGE
1	Memo of appeal	1-4
2	Affidavit	5
3	Appointment order dt: 14-01-1982	A	6-7
4	Service book	B	8-11
5	LPR order dt: 05.04.2021	C	12
6	Promotion order dt: 25.02.2021	D	13-14
7	Promotion order dt: 17.06.2021	E	15-17
9	Departmental appeal dt: 30.06.2021	F	18-19
10	Correspondence dt: 30.08.2021 & 25.09.2021	G	20-21
11	Wakalat Nama	22

Dated: _____.10.2021

APPELLANT

Through:

**NOOR MOHAMMAD KHATTAK
ADVOCATE**

FLATE NO. 04, 2ND FLOOR,
JUMA KHAN PLAZA, NEAR FATA SECRETARIAT,
WARSAK ROAD, PESHAWAR

0345-9383141

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

APPEAL NO. _____/2021

Diary No. 7833
Dated 29/10/2021

SHAHWAR BEGUM w/o Tehsin Ullah Khan, SPST (BPS-14) (Retired),
Govt. Girls Primary School, Civil Quarters Peshawar.
r/o House No. 36C5/C, Civil Quarters, Peshawar

..... **APPELLANT**

VERSUS

- 1- The Director (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- District Education Officer (Female), Peshawar.
- 3- Sub-Divisional Education Officer (Female), Town-III, Peshawar.

..... **RESPONDENTS**

APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDERS DATED 25.2.2021 AND 17.6.2021 WHEREBY COLLEAGUES AND JUNIOR COLLEAGUES OF THE APPELLANT HAS BEEN PROMOTED TO THE POST OF PSHT (BPS-15) WHILE THE APPELLANT WAS IGNORED AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENT APPEAL DATED 30-06-2021 OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this appeal the impugned order dated 25.2.2021 may kindly be modified/ rectified to the extent of appellant by directing the respondents to consider the appellant for proforma/notional promotion to the post of PSHT (BPS-15) w.e.f. 25.2.2021 with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

Filed to-day
Registrar
29/10/2021

R/SHWETH:

ON FACTS:

- 1. That appellant was the employee of the respondent Department and was initially appointed as PTC now PST vide order dated 14-01-1982 and since from the date of appointment the appellant has worked quite efficiently, whole heartedly and up to the entire satisfaction of his superiors. Copy of Appointment order dated 14-01-1982 is attached as Annexure **A.**

2. That the appellant after performing duty for sufficient time the appellant was promoted to the post of Senior Primary School Teacher (BPS-14) w.e.f 25-03-2013 vide dated 02-11-2013 for which necessary verified entry was made in the service book. Copy of Service Book is attached as Annexure **B.**
3. That the appellant was retired from service on attaining the age of superannuation on 19-12-2020 and as such leave Encashment under Rule-20 of the Khyber Pakhtunkhwa Revised Leave Rule-1981 was granted to the appellant equal to 365 days vide order dated 05-04-2021. Copy of the LPR Order dated 05.04.2021 is attached as Annexure **C.**
4. That colleagues & junior colleagues of the appellant was given promotion from the post of Senior Primary School Teacher to the post of Primary School Head Teacher (BPS-15) vide 25-02-2021 and where after another batch of colleagues & junior Colleagues have given promotion vide order dated 17-06-2021. Copy of Promotion Orders dated 25.02.2021 & Promotion Order dated 17-06-2021 is attached as annexure **D & E.**
5. That the appellant after received the promotion order of her colleagues & Junior Colleagues dated 25-02-2021 & 17-06-2021 the appellant filed Department Appeal dated 30-06-2021 for the grant of Proforma/Notional Promotion to the post of Primary School Head Teacher (BPS-15) upon which correspondence was made amongst the respondents but no response what so ever has been received to the appellant from any side. Copy of Departmental Appeal dated 30.06.2021 and Correspondence dated 30.08.2021 & 25-09-2021 is attached as annexure **F & G.**
6. That appellant feeling highly aggrieved and having no other remedy but to file the instant appeal on the following grounds amongst the others.

GROUND:

- A- That impugned Order dated 25.2.2021 issued by the respondents is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be modified/rectified.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

- C- That, the treatment meted out to the appellant is clearly based on discrimination and malafide and as such the respondents violated the principle of natural justice.
- D- That appellant is fully entitled for the grant of ante dated promotion in the post of (BPS-15) w.e.f. 25.2.2021.
- E- That appellant is fully entitled for his proforma promotion to post of PSHT (BPS-15) in light of the prevailing Rules.
- F- That the respondents acted in arbitrary and malafide manner while not allowing/granted proforma promotion to the appellant to the post of PSHT (BPS-15).
- G- That respondents violated Article 38(e) of the Constitution of Islamic Republic of Pakistan 1973; according to which state is bound to eliminate disparity in the income and earning of individuals including persons in the services of the Federation, thus in light of the above quoted Article the respondents are duty bound to grant proforma promotion to the appellant to the post of PSHT (BPS-15) with all back benefits.
- H- That according to Section-9 of the Civil servant Act, 1973 read with Rule-7 of the appointment, promotion and transfer Rules appellant is fully entitle for the grant of proforma promotion.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may very graciously be accepted as prayed for, please.

Dated: 28.10.2021


APPELLANT

Shahwar Begum
SHAHWAR BEGUM

THROUGH:

N
NOOR MOHAMMAD KHATTAK

&


MUHAMMAD MAAZ MADNI
ADVOCATES,
High Court Peshawar

CERTIFICATE:

No such like appeal is pending or filed between the parties on the subject matter before this Honourable Tribunal.


ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2021

SHAHWAR BEGUM

VS

EDUCATION DEPTT:

AFFIDAVIT

Stated on oath that the contents of the accompanying service appeal are correct to best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal.



Shahwar Begum
DEPONENT

CERTIFICATE:

Certify that no earlier service appeal has been filed by the appellant in the instant matter before this Honorable Service Tribunal.

Shahwar Begum
CERTIFICATION

6

ANNEXURE A

(786)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

The following Un trained candidates are hereby appointed in the National Pay Scale No.6 of Rs.315/-PM fixed plus usual allowances against the PTC posts in the Schools as noted against each on temporary basis in the interest of public service with immediate effect.

SrNo.	Name of Candidate with Father Name.	Posted at.	Remarks.
1.	Miss Nasrin Begum D/O H.Kim Shah.	GGPS Spin Bana(NSR)	RefusedSrNo.7, Bndt; No.5873-915. dt;25-11-81.
2.	Miss Anjum Tillat D/O Zubad Ali.	-do-	Refused, Sr8. -do-
3.	Miss Rashida Begum D/O Nobiul. Haq.	GGPS Mula Khan.(NSR)	RefusedNo.9. -do-
4.	Miss Mumtaz Qazi. D/O Q.Abdul Aziz	-do-	Refused, No.10. -do-
5.	Miss Shaukat bibi. D/O M. Shahzada.	GGPS Kahi.	RefusedNo.11. -do-
6.	Miss Khalida Begum.D/O M.Wadan Gul.	-do-	RefusedNo.12. -do-
7.	Miss Meher Sultana D/O M.Nooral Haq.	GGPS Umar Killi.	RefusedNo.11.
8.	Miss Zubaida bibi. D/O M.Mohammad Naqvi	GGPS Sara Banda,	RefusedNo.14. -do-
9.	Miss Jehan Noor. D/O M.Suhbat Khan.	GGPS Khoshgi Bala	viceSr;23.
10.	Miss.Zeenat ShaheenD/O M.Ghulam Mohammed.	GGPS Kuli Dhand(Chd)	RefusedSrNo.15 -do-
11.	Miss.Khalida GGPS Umar killi.(Trained)	GGPS Ulmanzai.	Vacant post.
12.	Miss.Janat bibi D/O Saadur Rehman.	GGPS.Katozai.	refusedSr13. -do-
13.	Miss.Parveen Begum D/O M.Usmanud Din.	-do-	" " 19. -do-
14.	Miss.Tawheeda BegumD/O M.Muzaifar Shah.	GGPS Hajizai.	" " 20 -do-
15.	Miss.Riffat Naz D/O Fazli Karim.	-do-	" " 21 -do-
16.	Miss.Meher Chaman. D/O Duran Shah.	GGPS Tehbana.	" " 22 -do-
17.	Miss.Shamim Akhtar.D/O Marefat Shah.	-do-	" " 23 -do-
18.	Miss.Kausar Parveend/O Gul Rohman.	GGPS Kossanzai.	" " 25 -do-
19.	Miss.Shahwar Begum D/O Mr.Mohammad.	GGPS Ali Jan Killi.	" " 28 -do-
20.	Miss.Jannat bibi. GGPS Kochian killi.(Chd).	GGPS Akhtar. Abad.	" " 30 -do-
21.	Miss.Bashiran Begum D/O Mir Rehman.	GGPS Abbas Abad.	" " 32 -do-
22.	Miss.Samina Begum D/O Mr.Inayatullah.	GGPS Abazai.	" " 34 -do-
23.	Miss.Safia Begum GGPS Khoshgi Bala.	GGMS Parang.	vacant post.
24.	Miss Sarfat Shahnan D/O Abdul Ghafoor.	GGPS Kochion.	vacant post.
25.	Miss.Salma Begum. D/O Pir Mohammad.	GGPS Kharangzai.	vacant post.

NOTE.1. No TA/DA. is allowed.

2. Charge reports should be submitted to this office and SDEO(F) concerned Tehsil with a copy to this office.

3xxx

ATTACHED

Next pages

- 3. The appointment of the candidates is purely on temporary basis and liable to termination at any time without assigning any reasons.
- 4. They will not request for transfer to Peshawar within two years as required under the Rules.

(MRS. M.M. AHMAD)
 DISTRICT EDUCATION OFFICER (FEMALE),
 PESHAWAR.

Endt; No. 649-87 / PTC: Apptt; Dated, Peshr; the 14-1- /82.

Copy of the above is forwarded for information and necessary action to the:-

- 1. 3. The Sub; Divisional Education Officer (Female) Peshawar, Nowshera and Charsadda, with the remarks that the Educational Qualification Certificates of the above mentioned Candidates may be checked and they should be sent to the Civil Surgeon Peshawar for Medical Examination within 6 days of their taking over charge.
- 4. The Director of Education (Schools) NWFP, Peshawar.
- 5. The Chairman, District Council, Peshawar w/r to his approval dated 14-1-82.
- 6-31. All Candidates concerned.
- 32. Personal file.

M. M. Ahmad
 14/1/82
 District Education Officer (F)
 Peshawar.

(FAZAL).
14182.

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ATTESTED

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9 Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination or appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.	
				Nature and duration of leave taken.	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government			
					Period			Government to which debitible
[Signature]	30/1/0	A/9/01	[Signature]			[Signature]	Service verified w.e.f from 1-12-2008 to 31-12-2009 from The Accy roll and other record in this office.	
[Signature]	30/6/11	A/10/11	[Signature]			[Signature]	Service Verified w.e.f 1-1-10 to 30-11-11 from	
[Signature]	30/11/11	A/2/11	[Signature]			[Signature]	Service Verified w.e.f 1-12-11 to 30/11 From Reg, Rail and Other Record of This Office	
[Signature] SDEO (F) Peshawar	2/11		[Signature] SDEO (F) Peshawar			[Signature]		
[Signature] SDEO (F) Peshawar	30/11/2011		[Signature] SDEO (F) Peshawar			[Signature]	Promoted to B.P.S 17th Part S.No. 3254-3967 dated 02-11-2012	
[Signature] SDEO (F) Peshawar			[Signature] SDEO (F) Peshawar			[Signature]		

ATTESTED

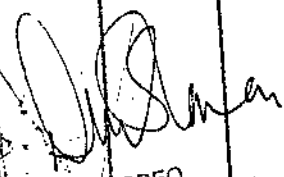
1	2	3	4	5	6	7	8	9
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "p"	Date of appointment	Signature of Government Servant.	Signature and Design of the head of the office or other attesting officer in attestation of columns 7 to 8
PST C.R.S 0.6.1965/3		(B.P.S.N. 12)	Rs. 11175/-			01/12/09	Shahwar Begum	
			Rs. 11485/-			01/12/2010	Shahwar Begum	
		(B-12 B 7000-500-22000)st	Rs. 18500			01/7/11	Shahwar Begum	
			Rs. 19000/-			01/12/11	Shahwar Begum	
			Rs. 19500/-			01/12/2012	Shahwar Begum	
			20000/-			1/2013	Shahwar Begum	
		B:14: 25000-610-26300						
		Punjab B:14 one piece in 9m	20200 610	20810		01/12/2013	Shahwar Begum	

ATTESTED

Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the terms	Date of appointment	Signature of Government Servant
<p>PST GGS Deheri Bagh Buzan Pesh</p>		<p>B:10: 3395-215-9745</p>	<p>8455 8670</p>	<p>1-7-2007 1-12-2007</p>			<p>Shahwar Beg</p>
<p>SGPS Civil Centre</p>		<p>B:12: 3630-260-11430</p>	<p>8830 9090</p>	<p>260 up to date + Pension</p>			<p>Shahwar Beg</p>
<p>10865</p>		<p>B:12: 4355-310-13855</p>	<p>10865 11175 11485 11795</p>	<p>1-7-2008 1-12-2008 1-12-2009 1-12-2010</p>			<p>Shahwar Beg</p>
<p>19007/11</p>		<p>B:12: 7000-500-22000</p>	<p>19000 19500 20000 20500</p>	<p>1-7-2011 1-12-2011 1-12-2012 1-12-2013</p>			<p>Shahwar Beg</p>
		<p>B:14: 3000-610-26300</p>	<p>20810 + 610</p>	<p>2-12-2013</p>	<p>Pension to B:14</p>		<p>Shahwar Beg</p>

Signature at of the head or other at in atten: column

Joint of the Accounts Officer
 Khayr Pakhru Khwa Peshawar
 Pay Fixed in the Revised Basic Pay Scales
 R.S. 22530 w.e.f. 01-07-2008
 Adj. Pay Fixed @ Rs. 22530 w.e.f. 01-07-2008
 R.S. 20865 w.e.f. 01-07-2008
 Pay Fixed @ Rs. 20865 w.e.f. 01-07-2008
 R.S. 19000 w.e.f. 01-07-2011
 Pay Fixed @ Rs. 19000 w.e.f. 01-07-2011
 Date of Next increment is on 01-07-2011


 SDEO
 (F) Peshawar.
 2 W/

Accounts Officer
 Pay Fixation Party
 Peshawar

ATTESTED



9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment.	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer.	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure or praise of the Government Servant.
				Nature and duration of leave taken.	Allocation of period of leave or average pay upto four months for which leave salary is debitible to another Government		
				Period	Government to which debitible		
		<p>Section/ sub-section Premature w.e.f. 2-12-2007 i.e. up to To Bilal Pishawar Depulad No: PD * SO- SR-112-123/2014 Dated 30-5-2014</p>	<p><i>[Signature]</i> SDEO (F) Peshawar.</p>	<p>Service Verified w.e.f. 1-12-2012 to 30-11-2013 From Reg. Roll & others Record of this Office</p> <p><i>[Signature]</i> SDEO (F) Peshawar.</p>	<p>TR No. 19 Date 2/1/03 Drawn Rs. 1,038/- ON A/C of Pay & Allowance due to <i>[Signature]</i> SDEO (F) Peshawar. we.f. 2/1/03 to 1-12-08</p> <p><i>[Signature]</i> Assitt Accounts Officer A.G. Office Peshawar.</p>	<p>30-11-2013</p>	<p>Granted Pakistan leave for 29 days on full pay vide DEO/PS Enclost No 3208-9 dated 11/3/14</p> <p>TR-226 21/7/14 185 3475/14</p> <p><i>[Signature]</i> SDEO (F) Peshawar.</p>

ATTESTED

[Handwritten notes and signatures]



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)

PESHAWAR.

12

ANNEXURE "C"

RETIREMENT / ENCASHMENT.

Under the provision of Rules 20 of the Khyber Pakhtunkhwa Govt: Servants Revised leave rules 1981, Sanction is hereby accorded for the grant of encashment in lieu of LPR equal to 365 days on full pay in R/O Mst. Shahwar Begum SPST BPS-14 GGPS Civil Quarters Peshawar.

She is also allowed to retirement from Government Service with effect from 19/12/2020 (AN) on superannuation of age.

Note:

1. Necessary entry to this effect should be made in her service book.
2. Her date of birth according to her Service Book is 20.12.1960.

(SAMINA GHANI)
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

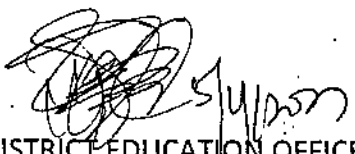
300-3-04

Endst: No. _____ / P.F./Shahwar Begum SPST GGPS Civil Quarters/

Dated. 5 / 4 / 2021.

Copy of the above is forwarded for information to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Sub Divisional Education Officer (F) Town-III Peshawar along with Original S/Book w/r to her Letter No.1659 dated 25-12-2020.
3. Teacher Concerned.
4. P/File.


Dy: DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR.

ATTESTED

DATED 25/2/2021

ANNEXURE - D

OFFICE ORDER

Consequent upon the recommendations of the Departmental Promotion Committee and approval of the competent authority, The District Education Officer (Female) Peshawar, in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SD (H&A) /1-18F&SP/2012 Dated 11-07-2012 & Finance Department Notification No.SD(FR/FD/10-22(E/2010) Dated 16-07-2012 and Govt of KPK SO (PE-5 SSRC/Meeting/2012/Teaching cadre) Dated 08-08-2017 the following Senior Primary School teachers (SPSTs) BPS-14 are here by promoted to the post of Primary School Head Teachers (PSHTs) BPS-15 (16120-1330-50020) @Rs.16120/- Plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Govt, in teaching cadre on the terms and conditions given below with immediate effect and further posted in the schools noted against each.

S. No.	Circle Name	Name of Youth	Name of Official	Present Place of Posting	Place of Posting	Remarks
1	MAYLANI	TOWN 4	SHAHIDA PARVEEN	GGPS AZA KHIL NO.2	GGPS GARHI NAZAR DAD	AVP
2	CANTT	TOWN 3	GUL FRANA	GGPS LANDI UDIAR 1	GGPS CHARKHAKHIL	AVP
3	CITY	TOWN 1	SUZIYAT BIBI	GGPS SHAH JEE ABAD	GGPS OLD KARIM PURA	AVP
4	CITY	TOWN 1	SADAF AFSHEEN	GGPS DAKKI MUNAWAR SHAH	GGPS DIHAKI MUNAWAR SHAH	AVP
5	H/ABAD	TOWN 3	SAFIA BEGUM	GGPS HAYATABAD NO.1	GGPS REGI MODEL TOWN	AVP
6	CITY	TOWN 1	RIFAAT DATOOL	GGPS SATTAR SHAH	GGPS MOHAMED ALI ISLAMABAD	AVP
7	OPURA	TOWN 2	AMINA BEGUM	GGPS NASIR PUR	GGPS URMAR PAYAN 2	AVP
8	OPURA	TOWN 2	SABILA AMIN	GGPS CHAMKAN NO 3	GGPS UMAR ATALAH	AVP
9	CITY	TOWN 1	NIZAKAT NASIM	GGPS GUL ABAD	GGPS SURIZAI BALA	AVP
10	OPURA	TOWN 2	AKHTAR SULTAN	GGPS CHUGHAL PORA	GGPS DALAZAK	AVP
11	H/ABAD	TOWN 3	ZAKHURA UN NISA	GGPS HAYATABAD NO.1	GGPS REGI NO.2	AVP
12	CANTT	TOWN 3	SADIA BIBI	GGPS CANTT NO.2	GGPS GARHI FAZAL RAHM	AVP
13	CITY	TOWN 1	BUSHRA YASMEEN	GGPS QUAID ABAD	GGPS MUSLIM ABAD KHORRKHURAY	AVP
14	CANTT	TOWN 3	ANEELA MEHBOOB	GGPS CANTT NO 1	GGPS CANTT. NO.1	AVP
15	H/ABAD	TOWN 3	KHALIDA JAFREEN	GGPS ISLAMIA COLLEGIATE	GGPS SUFAID SUNG	AVP
16	CITY	TOWN 1	HUMAIRA LATIF	GGPS WAZIR BAGH NO.2	GGPS KANDE MAROZAI NO.2	AVP
17	URMAR	TOWN 4	SAFIA NAZ	GGPS MERA KACHORI NO.1	GGPS GARHI BANAT	AVP
18	D/ZAI I	TOWN 2	MUSARRAT SHAHEEN	GGPS KHUKAR	GGPS MEWRA	AVP
19	H/ABAD	TOWN 3	RIASAT BEGUM	GGPS BADEZAI	GGPS GULAF DIHANDA	AVP
20	CANTT	TOWN 3	SHAGUFTA AKBAR	GGPS RAILWAY QRTS	GGPS KHWAJA MIR KHILAY	AVP
21	CANTT	TOWN 3	SHAHREEN AKHTAR	GGPS TEHKAL BALA NO.1	GGPS KAS KOROONA	AVP
22	CITY	TOWN 1	AFSHAN SHAHEEN	GGPS ASIA PARK	GGPS LALMA RAZAM KHAN	AVP
23	CANTT	TOWN 3	ROOMI LAILA	GGPS DIBERI BAGH BANAN	GGPS SHAGAI MIRA KHAN	AVP
24	D/ZAI I	TOWN 2	NHAYAT GUL	GGPS KHUZANA PAYAN	GGPS SHAH ALAM	AVP
25	H/ABAD	TOWN 3	ZARSANGA BIBI	GGPS PALOSI PIRAN	GGPS FOREST COLLEGE	AVP

ATTESTED



14

26	MATHRA 2	TOWN 2	AMINA QAZI	GGCMS DARMANGI	GGPS TERAI BALA	AVP
27	D/ZAI I	TOWN 2	ROBINA BEGUM	GGPS MUSLIM ABAD	GGPS MAMO KHATKI	AVP
28	CANTT	TOWN 3	RUBINA BEGUM	GGPS RAILWAY QUTS	GGPS AFRIDI ABAD	AVP
29	D/ZAI I	TOWN 2	NASRA BIBI	GGPS SAMMAR BAGH	GGPS SAMAR BAGH	AVP
30	B. BER	TOWN 4	RUKHSANA NAZ	GGPS BADDER HOROZAI	GGPS NAMDAR KORONA	AVP
31	II/ABAD	TOWN 3	SAJIDA	GGPS MALAKANDHER	GGPS INZAR BANDA	AVP
32	MATHRA 1	TOWN 2	NADIA GUL	GGPS KHAT KULLI	GGPS KHAT KULLI	AVP
33	CANTT	TOWN 3	RASHIDA KHANUM	GGPS DEHRI BAGHIBANAN	GGPS MERA BADABER	AVP
34	II/ABAD	TOWN 3	ZAKIA BEGUM	GGPS HAYAT ABAD 4	GGPS BARA QADEEM	AVP
35	CITY	TOWN 1	NAVEEDA AFZAL	GGPS GUL ABAD	GGPS KHAN ABAD	AVP

TERMS AND CONDITIONS.

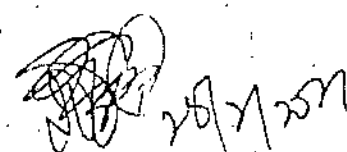
1. Charge Reports should be submitted to all concerned.
2. Necessary Entry to this effect should be made in their Service Books.
3. An undertaking should be obtained from the PSHTs concerned and will be recorded in their Service Books to the effect that if they wrongly promoted in the light of this order pointed out later on, will be reverted back and over payment made to them will be recovered from their pay, pension, gratuity etc.
4. Before handing over charge the said order may be verified from this Office.
5. They should take charge of their posts within fifteen (15) days after the date of issuance of this order, otherwise their order will be considered cancelled.
6. No TA, / DA etc, is allowed.


(SAMINA GHANI)
District Education Officer
(Female) Peshawar

Endst. No. 1594 - 1646 /Etab-II/F.No. PSHT Promotion 2021 Dated. 25 / 02 2021

Copy Forwarded for information to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. P.A to Director Elementary & Secondary Education Khyber Pakhtunkhwa.
3. Sub-Divisional Education Officer (Female) Town-I, II, III & IV Peshawar.
4. All ASDEO (F) Circle District Peshawar.
5. PSHTs Concerned.


Dy. District Education Officer
(Female) Peshawar


ATTACHED

Promotion Order of SPST BS-14
to BPS-15 (II) DATED 17-6-2021

15



Ph.091-9225459

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

ANNEXURE "E"

OFFICE ORDER

Consequent upon the recommendations of the Departmental Promotion Committee and approval of the competent authority, The District Education Officer (Female) Peshawar, in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO (B&A) 11-18/E&SE/2012 Dated 11-07-2012 & Finance Department Notification No.SO (FI/UD/ 10-22(E/2010) Dated 16-07-2012 and Govt of KPK SO (PE4-5/SPST Meeting/2012/ Teaching cadre) Dated 18-08-2017 the following Senior Primary School teachers (SPSTs) DPS-14 are hereby promoted to the post of Primary School Head Teachers (PSHTs) DPS-15 (15120-1330-56020) @Rs.16120/- Plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Govt. in teaching cadre on the terms and conditions given below with immediate effect and further posted in the schools noted against each.

S. No.	Sen. No.	Circle Name	Name of Town	Name of Official	Present Place of Posting	Place of Posting	Remarks
1	35	City	Town 1	MUNAWAR SULTANA	GGPS SATTAR SHAH	GGPS DARWAZGAI NO. 1	AVP
2	43	City	Town 1	AZRA BANO	GGPS SATTAR SHAH	GGPS DARWAZGAI NO. 2	AVP
3	150	H/Abad	Town 3	SHAHEEN AKHTAR	GGPS Tehkal Bala No.1	GGPS BARA CADEEM	AVP
4	174	D/Zal 1	Town 2	SAEEDA USMAN	GGPS Garhi Karim Dad	GGPS BELA ANWAR KHANI	AVP
5	364	City	Town 1	Ishrat Naz Gul	GGPS Zaryab Colony	GGPS SADIQ ABAD AZAKHEL	AVP
6	375	D/Zal 1	Town 2	Naheed Bibi	GGPS Banda Inayatullah	GGPS BANDA PAYAN	AVP
7	380	D/Zal 1	Town 2	Shakeela Begum	GGCMS ESA KHEL TOPCHIAN	GGPS TORI KALA	AVP
8	387	URMAR	Town 4	Shahida	GGPS URMER MIANA NO.1	GGPS SHAGAI MERA KHAN	AVP
9	383	URMAR	Town 4	Shabnum Tabassum	GGPS Musazai No.1	GGPS YOUSAF ABAD TELA BANO	AVP
10	388	Mathra-2	Town 2	Abida Begum	GGPS Panam Dehri BALA	GGPS PANAM DEHRI PAYAN	AVP
11	390	D/Zal 2	Town 2	Zonab	GGPS Shaghali Bala	GGPS PAYARI PAYAN	AVP
12	399	D/Zal 2	Town 2	Munzilat	GGPS BADI KOROONA	GGPS BADI KOROONA	AVP
13	400	C/Pura	Town 2	Roheena Elahi	GGPS Ghari Hamza	GGPS BELA MOMANDAN	AVP
14	403	Mathra-1	Town 2	Gule Lala	GGPS Khat Khilay	GGPS BAR BAR AMIR KHEL	AVP
15	405	URMAR	Town 4	Naheed Akhter	GGPS NO.1 URMER PAYAN	GGPS SHANSHATO	AVP
16	412	Canit	Town 3	Shazia Fazal	GGPS BEHARI COLONY	GGPS MIAN JEE BABA	AVP
17	415	B. BER	Town 4	Shakeela Begum	GGPS Badaber Harozai No.2	GGPS MERA BADABER	AVP
18	418	Canit	Town 3	Asifa Ahmad	GGPS SWATI GATE	GGPS BAGH GARHI MARYAMZAI	AVP
19	426	City	Town 1	Tanzeela Farman	GGPS Afghan Colony	GGPS GUL RAOF KALLAY	AVP
20	433	B. BER	Town 4	Nagina	GGPS Masho Pekay	GGPS Masho Pekay	AVP
21	438	Mathra-2	Town 2	Shaheen Bibi	GGPS GARHI SAIDAN	GGPS KAS KOROONA	AVP
22	441	URMAR	Town 4	Shazia Dilawar	GGPS Surtzal Payan No.2	GGPS KUZA QHERI TELA BANO	AVP

ATTACHED

NOTIFIED

AVP	GGPS HAFID ABAD	GGPS SHAH BALA	Rashida	Town 2	Mathra-2	442	23
AVP	GGPS CHORAKH	GGPS NO.1, URMER PAVAN	Sarwat Gul	Town 4	URMAR	443	24
AVP	GGPS QULLA SHER DIL	GGPS Chagher Malli	Noshreen Subhan	Town 2	Mathra-1	444	25
AVP	GGPS GUYAR DAND	GGMS Ghali Kander Khet	Khair Ul Wara	Town 2	Mathra-2	448	26
AVP	GGPS ANGOOR KORODNA	GGPS HARAYIA BALA	Natiz Gul	Town 2	D/Zai 1	451	27
AVP	GGPS PASSANI PAVAN	GGPS Adetal No.1	Uma Begum	Town 4	Mallani	454	28
AVP	GGPS KASHAN GARN ADEZAI	GGPS KASHAN GARN ADEZAI	Alsha Subhan	Town 4	Mallani	455	29
AVP	GGPS KHUWAJA MIR KALAY	GGPS ATTA MUHAMMAD	Nazia Ara	Town 4	URMAR	456	30
AVP	GGPS Masho Khet 1	GGPS Masho Khet 1	Nebe Jan	Town 4	B. BER	457	31
AVP	GGPS UMAR TALAB	GGPS URMER MIANA NO.1	Basmeha	Town 4	URMAR	459	32
AVP	GGPS AFRIID ADAD MASHO GAGAR	GGPS Kagwala Shari Abad	Sidra Urooj	Town 4	B. BER	460	33
AVP	GGPS GARNI AFSAR KHAN	GGPS NO.2 URMAR PAVAN	Zubaida	Town 4	URMAR	462	34
AVP	GGPS MUSHARZAI NO. 1	GGPS GHARI MALI KHEL NO.2	Mihayat Bibi	Town 4	B. BER	464	35
AVP	GGPS BAR GARNI MAARYAZI	GGPS SWATI GATE	Fakhrunisa	Town 3	CANIT	465	36
AVP	GGPS MASHO KHEL ANEZAI NO.1	GGPS MASHO KHEL ANEZAI NO.1	Susan Parveen	Town 4	B. BER	466	37
AVP	GGPS FAQIR BURNAH KALAY	GGPS PAVAKA	Sarwat Begum	Town 3	H/Abid	468	38
AVP	GGPS SULEMAN KHEL	GGPS Kagwala No.3	Jamila Rani	Town 4	B. BER	469	39
AVP	GGPS HASTAM KHAN KORODNA	GGPS Kagwala Shari Abad	Robina Bibi	Town 4	B. BER	476	40
AVP	GGPS MASHO KHEL ANEZAI NO. 2	GGPS MASHO KHEL ANEZAI NO.1	Abida	Town 4	B. BER	479	41
AVP	GGPS GULABAD MASHO GAGAR	GGPS Harrozi No.2	Shamshad Bibi	Town 4	B. BER	480	42
AVP	GGPS SARA SUNG	GGPS PAVAN DHERI BALA	Azma Begum	Town 2	Mathra-2	483	43
AVP	GGPS AZAKHEL NO. 3	GGPS Baid Khet No.2	Rozia	Town 3	CANIT	487	44
AVP	GGPS SUNZAI BALA	GGPS Dadher Harrozi No.2	Rubina Aalam	Town 4	B. BER	492	45
AVP	GGPS TURKI SARA SUNG	GGPS Sarhana	Almina Hassan	Town 2	D/Zai 2	496	46
AVP	GGPS ALI ZAI TEJA BAND	GGCIAS QILA SHAH MOHAMMAD	Pukraj	Town 4	B. BER	499	47
AVP	GGPS AU MUHAMMAD BANDA	GGPS SHAH DIL DAVIDA	Hatiz Halzem	Town 2	Mathra-2	502	48
AVP	GGPS MIANI GARNI	GGPS Baid Khet No.2	Abida Khatoon	Town 3	CANIT	503	49
AVP	GGPS HAMID KALAY	GGPS Ashraf Korona	Shahia Yasmin	Town 2	Mathra-1	507	50
AVP	GGPS SANIA DADABER	GGPS Gulshan Rehman	Rubina Shaheen	Town 3	CANIT	509	51

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR
Ph.091-9225459



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Ph.091-9225459

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

52	513	H/Abad	Town 3	Shazia Gul	GGPS REGI NO. 1	GGPS SAMAD KHAN KALAY	AVP
53	514	Mattani	Town 4	Robina Bibi	GGPS Garhi Jalal Din	GGPS Garhi Jalal Din	AVP
54	524	Urmar	Town-4	Anees Khatoon	GGPS MALOGO JHAGRA	GGPS MASTARANO KALAY	AVP
55	528	B. BER	Town 4	Mehnaz	GGPS SHIEKH MUHAMMADI NO.1	GGPS TEMAR KHEL MASHO KHEL	AVP
56	531	B. BER	Town 4	Saima Begum	GGPS Badaber Harozai No.7	GGPS AYAZ KOROONA	AVP
57	536	Cantt	Town 3	Umm-E- Kalsoom	GGPS RAILWAY QRTS	GGPS AZAKHEL NO. 1	AVP
58	543	Cantt	Town 3	Fatima Shaheen	GGPS RAILWAY QRTS	GGPS TELA DAND GHALIB KHEL	AVP
59	546	City	Town 1	Narra Begum	GGPS Civil Colony	GGPS KALA KHEL	AVP
60	551	H/Abad	Town 3	Samina Khatoon	GGPS AGRICULTURE COLLEGE	GGPS YOUSAF KHEL	AVP
61	560	Cantt	Town 3	Sarwat Begum	GGPS Civil Quarters	GGPS BAHAR GARHI	AVP
62	561	Mathra-1	Town 2	Farhat Bukhari	GGPS KODAI	GGPS PIR KALAY NO. 1	AVP
63	564	Cantt	Town 3	Shabana Hashmi	GGPS SWATI GATE	GGPS GARHI NAZAR DAD	AVP
64	565	D/ Zai 1	Town 2	Anjum Begum	GGPS KHANA BAD	GGPS KHANA BAD	AVP
65	570	Mathra-2	Town 2	Bibi Zuhra	GGPS Ghalgi Kandar Khel	GGPS GARHI CHANDAN	AVP
66	574	C/Pura	Town 2	Nabeela Husein	GGPS CHUGHAL PURA	GGPS MERA KARA KHEL	AVP

TERMS AND CONDITIONS.

1. Charge Reports should be submitted to all concerned.
2. Necessary Entry to this effect should be made in their Service Books.
3. An undertaking should be obtained from the PSITs concerned and will be recorded in their Service Books to the effect that if they wrongly promoted in the light of this order pointed out later on, will be reverted back and over payment made to them will be recovered from their pay, pension, gratuity etc.
4. Before handing over charge the said order may be verified from concerned SDEO office.
5. They should take charge of their posts within fifteen (15) days after the date of issuance of this order, otherwise their order will be considered cancelled.
6. No TA / DA etc. is allowed.

(SAMINA GHANI)
District Education Officer,
(Female) Peshawar

Endst. No. 776-858 /Estab-II/F.No. PSIT Promotion 2021 Dated. 17/06/2021

Copy Forwarded for information to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. P.A to Director Elementary & Secondary Education Khyber Pakhtunkhwa.
3. DMO EMO, Peshawar.
4. Sub-Divisional Education Officer (Female) Town-I, II, III & IV Peshawar.
5. All ASDEO (F) Circle District Peshawar.
6. PSITs Concerned.

[Signature]
Dy. District Education
Officer (Female) Peshawar

ATTESTED

گورنمنٹ سروس ڈسٹرکٹ (کوئٹہ) افسر صاحبہ (زنانہ) پشاور
 درخوست برائے پروموشن (تعمیری)

ضابطہ عالیہ

سوداگم گذارشی ہے کہ فوریہ نے ریٹائرمنٹ کے بعد اپنی ترقی SPST-BPS-14 سے
 HPST-B-15 سروس 30 6/21 اپیل داخل کیا۔ جو DEOLF 7-11 کو مکمل کیلئے ارسال کیا۔
 جس کی اپیل کی تالی نے ٹائٹ ASDEO نیٹ سرکل سرورڈ ریٹائرمنٹ کے لئے ارسال کیا جو اس
 میں سے لیکر پڑا تھا۔ فوریہ نے مار مار کر اس میں ترقی پر ASDEO نیٹ سرکل نے رپورٹ
 SDEOLF ٹائٹ III کی ارسال کی۔ اس رپورٹ میں لکھا ہے کہ :-

1۔ یہ سروس ریگیم SPST-B-14 سے چلے گئی پروموشن کا کیس نہیں دیا ہے۔
 سلسلہ بند سرٹیس سے فون پر معلوم حاصل ہے کہ اس میں (بڑے نمبر) کوئی
 پروموشن کا کیس ارسال نہیں کیا ہے۔ ASDEO لکھی ہے کہ میں ریٹائرمنٹ میں
 لکھا ہے کہ یہ ریٹائرمنٹ ہو چکی ہے۔

2۔ ضابطہ عالیہ میں یہ وضاحت کرنا چاہیے کہ اس کا رپورٹ مجموعہ کا بلڈ ہے۔ یہ کہ
 فوریہ کا سروس جتنی اس کی دفتر گیا ہے یہ ہمیشہ غیر حاضر رہی ہے۔ صرف وہ کیڈر باہر موجود
 ہوتا ہے۔ 2۔ AC R وغیرہ کے لئے نمایاں اپیل کیا تو منسلک ہے وہ بند سرٹیس سے
 دستخط نہیں ہے۔ 3۔ یہ لکھی ہے کہ میں ریٹائرمنٹ میں کہ یہ ریٹائرمنٹ ہو چکی ہے
 اس وقت میرا ریٹائرمنٹ کیا تھا۔ یہ سب جھوٹ ہے۔

فوریہ نے تعلیمی قابلیت سمندر اور DMS کی گائیڈ لائن کے لئے تو جس کیلئے فوریہ نے
 اس میں داخل کر کے سمندر وغیرہ وصول کیا OBA, FA اس کے علاوہ شاہد پیر
 لکھ دیا کہ میں پروموشن لیتا ہوں اور جہاں میں ہرگز نہیں ہوں وہاں میں کوئی جادو کا
 تمام ڈاؤنٹیشن کی جاعدہ فائل بنائے جو کہ بدست وہ اہم کلیم "جو اس دفتر میں
 اس کی بطور اسٹاک کام آتی ہے دے دے۔

ضابطہ عالیہ: فوریہ نے تین فریقہ اپنا پروموشن فارگو کیا تھا اور اس میں لکھ کر
 دیا کہ میں پروموشن لے لیتی ہوں۔
 DEOLF Postcard
 Diary No. 909 dt 30 6 2021

ATTESTED

ایسٹا فڈریوہ التماس رتی سے نہ سائلہ کی NATIONAL PROMOTION دیا گیا

تاکہ فڈریوہ پیش پیش کے لئے شکر ہے

مورخہ 21/6/2021

العارضے

ایسٹا فڈریوہ سپر وائزر کے لئے SPST-BS-14 (ریٹائرڈ) کے لئے عہدہ

Shahwar Begum

ATTENDED

20



**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR. Email I.D. emisfeshawar@gmail.com**

No. _____ / Etab-II/
Promotion SPST To PSHT June-2021

Dated Peshawar the 3rd /08/2021.

ANNEXURE 'G'

To

The Sub Divisional Education Officer
(Female) Town-III, Peshawar.

Subject: - Appeal for promotion.

Memo:

Reference to the subject cited above and to state that an appeal received from Mst: Shahwar Begum Ex-SPST GGPS Civil Quarter retired from Govt service on 20-12-2020 on superannuation of age regarding promotion from SPST BPS-14 to PSHT BPS-15 and further asked you to submit comments in connection with appeal (copy attached).

District Education Officer,
(Female) Peshawar

Endst: No. 3135

Copy of the above is forwarded for information to the:-

1. Mst: Shahwar Begum EX-SPST GGPS Civil Quarter Peshawar.

B
30/8/21

District Education Officer
(Female) Peshawar.

ATTESTED

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OFFICE OF SUB DIVISIONAL EDUCATION OFFICER

(FEMALE) TOWN -III PESHAWAR

No. 4077 Dated 25/9/2021.

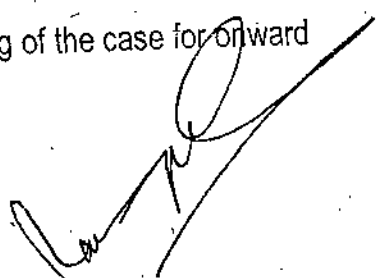
To

The District Education Officer,
(Female) Peshawar.

Subject: APPEAL FOR PROMOTION.

Memo:

Reference your office letter No.313/Estt:II/Promotion SPST to PSHT/June 2021 dated 30-08-2021 on the subject noted above and to inform that Mst. Shahwar Begum, SPST, BPS-14 was retired on 20/12/2020 during processing of the case for onward submission to the DPC.


Sub-Divisional Education Officer
(Female) Town-III Peshawar

SDEO (F)
Town III Peshawar

DEO (F) Peshawar

Diary No. 1099

27/9/2021


APPESTED

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Service appeal no. 7729/2021

Mst. SHAHWAR BEGUMAppellant

V/s

EDUCATION DEPARTMENTRespondents

PARAWISE REPLY ON BEHALF OF RESPONDENT

No. 2/2021

Respectively Sheweth:

The Respondents submit below:

PRELIMINARY OBJECTIONS:

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


Reply on Facts:

1. That Para No 1 Pertains to record.
2. That Para No 2 is also pertains to record.
3. That Para No 3 is correct to the extent that the appellant was retired on the age superannuation on dated 19-12-2020.
4. No comments
5. It is correct, but no DPC has been hold after June 2021, therefore her case has not yet considered.
6. As in Para No-05 above

REPLY TO GROUND

- a. That ground A is incorrect, misleading and against the facts the appellant was superannuation before the promotion order dated 25-02-2021 therefore the said order is according to law and rules.
- b. That ground b is incorrect and misleading the said articles and no violation has been made being retired on 20-12-2021.
- c. That ground c is incorrect, misleading and against the facts the respondent department is bound to act upon the law and rules.
- d. That ground d is incorrect, misleading and against the facts. The appellant was retired before the promotion order of dated 25-1-2021 and at the time of promotion order 25-2-2021 she was not more civil servant willful absented from her duty and never joined the duty after the expiry of said sanctioned leave.
- e. The appellant case will be considered for promotion on national basis from the data of retirement in next DPC as per rules.
- f. That Ground F is incorrect and misleading the respondents is bound to act upon the exciting law and rules.
- g. That ground g is incorrect.
- h. That ground h is incorrect; misleading the appellant as retired before the promotion order therefore she was considered for further promotion under the rules.
- i. That the respondents also seek permission to advance other grounds and proof at the time of arguments.

The above reply is submitted for the kind Considered of the Court.

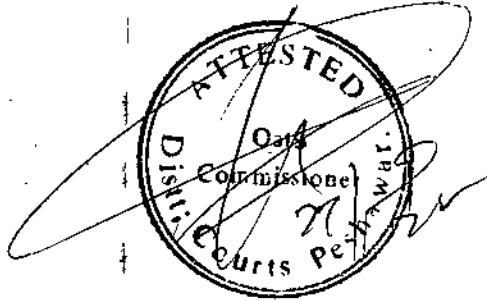

97/09/2022

**District Education Officer
(Female) Peshawar**

Affidavit

Stated on Oath the content of the reply is correct to the best of my knowledge and nothing has been concealed from this honorable service tribunal.

(Signature)
27/09/2022



**District Education Officer
(Female) Peshawar**