

03rd April, 2023

Learned counsel for the appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for the respondents present.

Learned counsel for the appellant seeks some time for preparation for arguments. Last opportunity is given. To come up for arguments on 02.05.2023 before the D.B at Camp Court Swat. Parcha Peshi given to the parties.



(Salah-ud-Din)
Member (J)
Camp Court Swat



(Kalim Arshad Khan)
Chairman
Camp Court Swat

02.05.2023 Muhammad Javid Khan Advocate present and submitted Wakalat Nama in favor of appellant.

Fazal Shah Mohmand, learned Additional Advocate General for respondents present.

Being freshly engaged, learned counsel for appellant requested for adjournment. Adjourned. To come up for arguments on 06.06.2023 before D.B at Camp Court, Swat. Parcha Peshi given to the parties.



(Fareeha Paul)
Member (E)
Camp Court, Swat



(Rozina Rehman)
Member (J)
Camp Court, Swat

04.11.2022

Appellant present in person.

Kabir Ullah Khattak, learned Additional Advocate General alongwith Ikram Uddin ADEO for respondents present.

Written reply on behalf of respondents submitted which is placed on file. A copy of the same is handed over to the appellant. To come up for rejoinder/arguments on 15.12.2022 before D.B.



(Rozina Rehman)
Member (J)

15.12.2022

Due to general strike of the Bar, case is adjourned to 07.03.2023 before D.B. Office is directed to notify the next date on notice board as well as the website of the Tribunal.

SCANNED
KPST
Peshawar



(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)

07th March, 2023

Nemo for the appellant. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

On previous date, the matter was adjourned because of strike of lawyers, therefore, it is deemed appropriate that let a notice be issued to appellant and his counsel for 03.04.2023 and as the matter pertain to Camp Court Swat, therefore, to come up for arguments before the D.B at Camp Court Swat. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar



(Salah-ud-Din)
Member (J)

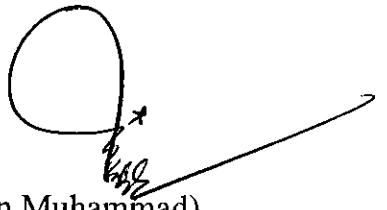


(Kalim Arshad Khan)
Chairman

20.07.2022

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

It is evident from the previous order sheet dated 02.06.2022 that the respondent department had been given last chance for submission of reply/parawise comments. Despite last chance, the respondent department could not submit the requisite reply/parawise comments today. Learned Additional Advocate General appeared on behalf of the respondents at fault and requested for yet another chance enabling him to contact and consult the respondents to submit reply/parawise comments. The request is acceded to but as last chance whereafter coercive measures shall invariably be initiated against the respondents at fault. Adjourned. to come up for reply/parawise comments on 19.10.2022 before S.B.

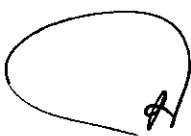

(Mian Muhammad)
Member (E)

19.10.2022

Junior to counsel for appellant present.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Reply not submitted. Learned AAG requested for time to submit reply/comments granted but on payment of cost of Rs.3000/- to be paid in Court through proper receipt which will later on be paid to the appellant. To come up for reply/comments on 04.11.2022 before S.B.


(Rozina Rehman)
Member (J)

SCANNED
KPST
Peshawar

05.01.2022

Counsel for the appellant present and submitted an application for placing on file necessary and important documents for just decision of the case. Placed on file. Preliminary arguments heard. Record perused.

Points raised need consideration. The appeal is admitted for hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments 14.03.2022 before the S.B.

Security & Process Fee

(Rozina Rehman)
Member (J)

14.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 02.06.2022 for the same as before.

Reader.

2nd June, 2022

Clerk of counsel for appellant present.
Mr. Kabeerullah Khattak, Addl. AG for respondents present.

Respondents have not submitted reply/comments. Last chance is given to respondents for submission of reply/comments on 20.07.2022 before S.B.

SCANNED
KPST
Peshawar

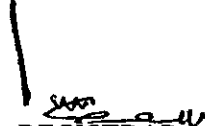


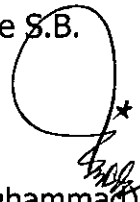
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7395 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/09/2021	<p>The appeal of Mst. Naseema Bibi resubmitted today by Mr. Shahid Ali Yaftali 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 for preliminary hearing to be put up there on <u>01/11/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	01.11.2021 	<p>Clerk of learned counsel for the appellant present. Former requests for adjournment on the ground that learned counsel is not available today. Granted. To come up for preliminary hearing on 05.01.2022 before S.B.</p> <p style="text-align: right;"> (Mian Muhammad) Member(E)</p>

The appeal of Naseema Bibi, GGPS Harchina, District Peshawar presented today i.e. on 01.09.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Check list is not attached with the appeal.
- 4- In all documents the name of the appellant may be highlighted.
- 5- Annexure A of the appeal are illegible which may be replaced by legible/better one.
- 6- Copies of transfer orders vide order no. F.1-9/168 EST. (D) FDE and to GGPS Harchin in respect of appellant are not attached with the appeal which may be placed on it.
- 7- Application of condonation of delay in filing of appeal.

No. 1715 /S.T,

Dt. 01/09 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Shahid Ali Yaftali AHC.

Dears Sir,

Re-Submited after the Complish all objection
Except objection No-6 is not availed at the time
we submited it at the time of Arguments.

Shahid Ali Yaftali
Advocet Hign

Dated - 9-9-2021

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

CHECK LIST

SCANNED
KPST
Peshawar

Nasima Bibi

Versus

Secretary Education & others

..... Appellant

..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Shahid Ali Yaftali Advocate High Court</u>	√	
2.	Whether Counsel/Appellant/Respondent/Deponent 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?	√	
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?		√
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:- Shahid Ali Yaftali

Signature:- 

Dated:- 09.09.2021

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

CHECK LIST

7395/21

Nasima Bibi

Versus

Secretary Education & others

..... Appellant

..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Shahid Ali Yaftali Advocate High Court</u>	√	
2.	Whether Counsel/Appellant/Respondent/Deponent 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?	√	
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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:- Shahid Ali Yaftali

Signature:- 

Dated:- 09.09.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**PESHAWAR**

Service Appeal No. _____/2021

Naseema Bibi

Versus

Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa,
Peshawar**INDEX**

S NO.	DESCRIPTION OF THE DOCUMENTS	ANNEX	PAGES
01	Grounds of Service Appeal	--	1-4
02	Affidavit	--	5
03	Copy of the Order of Upgradation from BPS-09 to BPS-18	A	6 to 17
04	Copy of the KP Education Dept. Order dated 07.12.2010	B	18
05	Copy of the Office Order dated 01.03.2011	C	19
06	Copy of the Promotion Order to BPS-15 dated 26.12.2012 and Service Book	D & D1	20 to 26
07	Copy of the Request for NOC & Copies of NOCs	E	27 to 29
08	Copies of relieving report, orders of posting in And RaghRech & ReshunGole	F, F1 & F2	30 to 32
09	Copies of the Order of Withdrawal of Promotion Order to BPS-15	G	33
10	Copy of the Departmental Appeal dated 23.02.2021	H	34
11	Application for suspension of impugned order	--	35
12	Affidavit	--	36
13	Application for condonation of delay with Affidavit		37 to 38
14	Memo of Addresses	--	39
15	Wakaalat Nama	--	--

APPELLANT

Dated: 01.09.2021

Through

SHAHID ALI YAFTALI

Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

KHYBER PUKHTUNKHWA

Service Appeal No. 2395/2021

Naseema Bibi D/O Noor Alam Khan,
Currently posted at Government Primary School, Harchina,
District Chitral.

.....APPELLANT

VERSUS

1. **Secretary to the Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, Peshawar**
2. **Director, Elementary and Secondary Education Department, Khyber Pakhtunkhwa**
3. **District Educational Officer, (Female) Upper Chitral**

.....RESPONDENTS

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 18.08.2020 REGARDING THE ARBITRARY AND ILLEGAL WITHDRAWAL OF NOTIFICATION OF PROMOTION INTO BPS-15

Respectfully sheweth;

The appellant most earnestly craves permission of this Hon'ble Tribunal to submit as under:

BRIEF FACTS

1. **That, the Appellant is a school teacher currently serving at the Government Primary School, Harchina, District Chitral.**
2. **That, the Appellant joined the Elementary and Secondary School Department on 02.12.1995 on a PST post. On 10.11.2008, the Appellant was upgraded from PST (BPS-09) to BPS-12 vide Order No. 8136-38/E-5 (AC).**

(Copy of the Order attached as Annex-A)

3. **That**, as per the KP Education Department Order No. SO (PE) 5-2/03/IPT/Chitral dated 07.12.2010 the appellant's services were placed at the disposal of the Federal Directorate of Education Islamabad on deputation basis.

(Copy of the Department Order dated 07.12.2010 attached as Annex-B)

4. **That**, on 01.01.2011, the Appellant was posted at Federal Government Girls Bain Nala by the Federal Directorate of Education vide Office Order No. F.01-09/2011 (W) FDE.

(Copy of office order dated 01.03.2011 attached as Annex-C)

5. **That**, on 26.12.2012, the Appellant was promoted to BPS-15 vide Office Enst. No. 21023-27 dated 26.12.2012 and her pay was fixed for this position by the SDEO (F) Mastuj.

(Copy of order of promotion order dated 26.12.2012 and service book attached as Annex-D and D-1)

6. **That**, the Appellant served with the Federal Directorate of Education till 06.03.2020 as the KP Elementary and Secondary Education Department issued her NOCs for continuing duties on deputation during this period.

(Copies of requests for NOCs and copies of NOCs attached as Annex-E)

7. **That**, on 06.03.2020, the Appellant was transferred to her parent department vide Order No. F.1-9/168 EST. (D) FDE, and took charge in district Chitral on 01.04.2020. On 07.08.2020, vide Endst. No. 1868-73/F NO. EB (F) A/P-01, she was adjusted against the vacant post in Government Girls Primary School RaghRech. while on 18.08.2020, she was adjusted against the vacant post in Government Girls Primary School ReshunGole vide Endst No. 1829-35/ F No. EB (F) P/C-01. Later, she was transferred to the Government Girls Primary School, Harchin, District Upper Chitral.

(Copies of relieving report, orders of posting in

And RaghRech & ReshunGole are attached as Annex-F,
F1 and F2 respectively)

8. That, on 18.08.2020 the District Education Officer, (Female) Upper Chitral, vide Endst No. 1824-25/ FNo. EB (F) P/C-01, without disclosing the reason withdrew the order of the Appellant's promotion to BPS-15.

(Copy of the order of withdrawal of promotion order to
BPS 15 attached as Annex-G)

9. That, aggrieved of the withdrawal of the promotion order without any reason, justification or proceeding, on 23.02.2021, the Appellant filed her Departmental Appeal to the Director Elementary and Secondary Education, however, despite following up with the Department multiple times, the Respondents have not addressed her grievance.

(Copy of the Departmental Appeal dated 23.02.21 is
attached as Annex-H)

10. That, the Appellant aggrieved of the acts of the Respondents i.e. withdrawal of promotion to BPS-15 and their conduct of ignoring her Departmental Appeal approaches this Hon'ble Tribunal with the following grounds, amongst others:

GROUND

- A. Because, the appellant's promotion order to BPS-15 was withdrawn without a reason, and without the due process of law, violating her fundamental rights enshrined in the Constitution of the Islamic Republic of Pakistan.
- B. Because, the appellant has not been treated in accordance with law.
- C. Because, the Appellant has a stellar service record and no disciplinary proceedings have been conducted against the Appellant.
- D. Because, the reason for the withdrawal of her promotion order has not been disclosed to her. neither has she been given an

opportunity of hearing before this arbitrary decision of withdrawal of promotion order to BPS-15 was made.

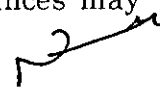
E. Because, this seriously affects the career progress of the appellant, as her fellow teachers have already been promoted to BPS-16 while she has been pushed backed to BPS-12.

F. The appellant seeks prior approval of this Hon'ble Tribunal to take up additional arguments at the time of the hearing of the instant appeal.

PRAYER

It is, therefore, submitted with profound respect that this Hon'ble Tribunal may very graciously be pleased to:

- i. Direct the respondents to restore the appellant to her rightful grade, i.e. BPS-15 as per the Promotion Order Office Enst. No. 21023-27 dated 26.12.2012.
- ii. Direct the respondents to provide the appellant all back benefits since her promotion in 2012.
- iii. Direct the respondents to adjust her seniority as per her promotion into BPS-15 from 2012.
- iv. Direct the respondents to cover the legal costs associated with the instant service appeal.
- v. Any other relief deemed appropriate in the circumstances may also very graciously be granted.


APPELLANT

Dated: 01.09.2021

Through


SHAHID ALI YAFTALI
Advocate High Court (s)


AQEEL AHMAD YOUSAFZAI
Advocate High Court (s)

CERTIFICATE

It is certified that no such other appeal on the same matter has earlier been filed by the appellant before this Hon'ble Tribunal.


ADVOCATE

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. _____/2021

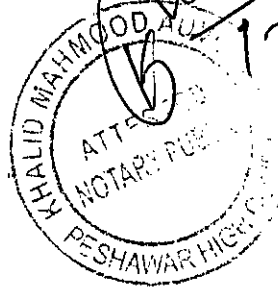
Naseema Bibi

Versus

**Secretary Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar**

AFFIDAVIT

I, Naseema Bibi D/O Noor Alam Khan currently posted at Government Girls Primary School Harchina, Upper Chitral do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and nothing has been concealed from this Hon'ble Court.



DEPONENT
CNIC No.15202-2106455-4

OFFICE OF THE DISTRICT COORDINATION OFFICER CHITRAL.

Dated Chitral the 10th November 2008

ORDER.

No: 8135 /E-5 (AC). In pursuance of Finance Department, Government of NWFP, Notification No. FD/SO (FR)10-22/2007 dated 26-01-2008 and as recommended by the DPC in its meeting held on 6-11-2008, sanction is hereby accorded to the grant of Up-graded scale BPS-12 and rename as Head Mistress of Primary School to the following Primary School teachers of Education Department Chitral with effect from 1-10-2007.

S.No.	Name of Teacher	Name of School	BPS	Upgraded scale
1	Rahina Shafiq	Lawi	10	12
2	Bibi Janila	Wullun	10	12
3	Bibi Iran	Jughoor	10	12
4	Poli Noz	Shoghor	10	12
5	Sambra Bibi	Mughalandeh	10	12
6	Bibi Jan Khunza	Honedahar	10	12
7	Bibi Taj	Bakamak	10	12
8	Sarla Bibi	Sandasta	10	12
9	Rabia Basri	Denin	10	12
10	Bibi Banazir	Mughalandeh	10	12
11	Nasim Akhtar	Shiaqutak	10	12
12	Farida Bibi	Kaju	10	12
13	Tila Bibi	Ayun	10	12
14	Khurshid Lahan	Ayun	10	12
15	Sultan Banu	Shoghor	10	12
16	Razia Sultana	Nashku (P) ✓	10	12
17	Rahman Jamal	N.Ovir ✓	10	12
18	Bibi Fatma	Mastuj ✓	10	12
19	Bibi Saadia	Z/Gram ✓	10	12
20	Bibi Hawala	Istach ✓	10	12
21	Noor Jahan	Baramkagh ✓	10	12
22	Sifat Bibi	Parpish ✓	10	12
23	Suriya Bibi	Kuragh ✓	7	12
24	Nilufar Sultana	Kessu	10	12
25	Bibi Amina	G:Chashma	10	12
26	Nasim Akhtar	Drosh	10	12
27	Hyber Bibi	Honedahar	10	12
28	Farzana Yasmeen	G:Chashma	10	12
29	Hasina Bibi	Thoriandeh	10	12
30	Razia khatoon	Drosh	10	12
31	Yasmeen Bibi	Chumurkon	10	12
32	Zainab Jamal	Brep ✓	7	12
33	Rahina Begum	Dizg ✓	10	12
34	Haji Bibi	Drosh ✓	10	12

Handwritten signature/initials

22/3/08
11/11/08

S.No.	Name of Teacher	Name of School	BPS	Upgraded scale
35	Badiul Jamal	Denin	10	12
36	Sharafatun Nisa	Morol Payeen	10	12
37	Shahnaz Begum	Chitral	10	12
38	Ashraf Bibi	Thoriandeh	10	12
39	Tahira Jabeen	Mughalandeh	10	12
40	Jehan Khorshid	Chitral	10	12
41	Hamida Bibi	Drosh	10	12
42	Mehri Zarif	Nishku Bala ✓	10	12
43	Bibi Zainab	Shagram Dg. ✓	10	12
44	Zulikha Bibi	Mastuj ✓	10	12
45	Amina Bibi	Mardak ✓	10	12
46	Gulsana	Zait. ✓	10	12
47	Halima Parveen	Kosht Bala ✓	10	12
48	Jamila Narges	Mustajapandeh	10	12
49	Najma Sultana	Drosh	10	12
50	Shamim Ijaz	Deini	10	12
51	Shahzadi Nargus	Ayun	10	12
52	Farhad	Broze	10	12
53	Zianab Bibi	Lasht shishi	10	12
54	Mehraj Gul	Singoor	10	12
55	Shamim Akhtar	Mughalandeh	10	12
56	Taqdeer Jamal	Ayun	10	12
57	Bibi Shari Zareen	kushum (P) ✓	10	12
58	Bibi Hasina	Ayun	10	12
59	Shahina Bibi	Drosh	7	12
60	Bibi Zulaikha	Parkusap ✓	10	12
61	Bibi Khatija	Sarghuz ✓	10	12
62	Karima Bibi	ReshunGole ✓	10	12
63	Shams Bibi	Terich Payeen ✓	10	12
64	Bibi Sabira	Parpish ✓	10	12
65	Bibi Shakira	Parcosab ✓	10	12
66	Bibi Shahida	Rayeen ✓	10	12
67	Gul Dana	Moder ✓	10	12
68	Bibi Sallma	G:Chashma	10	12
69	Najima Farzana	Jughoor	10	12
70	Nasim Akhtar	Orghuch	10	12
71	Bibi Abida	Murdan	10	12
72	Khalida	Take Kaldam	10	12
73	Tahira	Barenis Payeen	7	12
74	Bibi Nasreen	Kosht (P) ✓	7	12
75	Bibi Zahiran	Gohkir ✓	9	12
76	Bibi Zahida	Charun ✓	7	12
77	Saeeda Bibi	Jughoor	10	12
78	Jamila Perveen	Jughoor	10	12
79	Muslima Qayum	Khorandok	10	12

(7)

✓

25

8

S.No.	Name of Teacher	Name of School	BPS	Upgraded scale
80	Essa Jamal	Ayun	10	12
81	Bibi Mushrifa	Bakerabad	10	12
82	Sultana Bibi	Chitral	10	12
83	Sharifun Nisa	Bumburate	9	12
84	Bibi Fatima	Nichagh Ovir ✓	10	12
85	Qamar Bibi	Khot (II) ✓	9	12
86	Bibi Rabia	Madak ✓	10	12
87	Ajab Nigar	chaun Ower ✓	10	12
88	Nasreen Bibi	Harchin ✓	9	12
89	Shanaz Bibi	Reshun ✓	7	12
90	Noshat Begum	Rhn:Raghan ✓	7	12
91	yasmeen	IRONI (P) ✓	9	12
92	Badlul Jamal	Kosht (P) ✓	9	12
93	Zaibun Nisa	Lone ✓	9	12
94	Qimat Bibi	CMS (W.) ✓	7	12
95	Farman Bibi	Khot (II) ✓	7	12
96	Nazook Bibi	Shotkhar ✓	7	12
97	Bibi Hamida	Ragh Rich ✓	10	12
98	Shahnaz Gul	Chitral	9	12
99	Shahnaz Bibi	Mahlepatak	10	12
100	Malik Bibi	Chumurkon Koh	10	12
101	Mehri Nigar	Ashirate	10	12
102	Fahmina Perveen	CMS Ayun	10	12
103	Shamim Ara	Parabaig	9	12
104	Nasreen Jamal	Ariyan	9	12
105	Nasira Bibi	Barenis	9	12
106	Nusrat Bibi	Kaju	9	12
107	Jamshid Bibi	Broze	9	12
108	Khadija Mastoor	Goldoor	9	12
109	Farhad Irshad	Singoor	9	12
110	Zaiba Pari	Broze Goldeh	9	12
111	Khonza Pari	Drosh	9	12
112	Narges Banu	Uiak	7	12
113	Bibi Sharifa	Ariyan	9	12
114	Narges Bibi	Shali Lasht	9	12
115	Zeenat Begum	Goldoor	9	12
116	Mubarak Bibi	Thoriandeh	9	12
117	Suraya Bibi	Broze Kor	7	12
118	Farman Nisa	Sonoghor ✓	7	12
119	Shamshad Begum	Broze	9	12
120	Bibi Ayeesha	Moroi Payeen	7	12
121	Bibi Shahida	Tar Shishi	7	12
122	Bibi Amina	Denln	7	12
123	Bibi Shamsia	Chitral	7	12
124	Bibi Maryam	Tar Shishi	7	12

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44

S.No.	Name of Teacher	Name of School	BPS	Upgraded scale
125	Razia Sultana	Kari	9	12
126	Mirri Jamal	CMS Gulashma	9	12
127	Lala Rukh	Uiak	7	12
128	Baghicha	What	7	12
129	Shahi Khuban	Goldoon	9	12
130	Shahida Akhtar	Bakerabad	9	12
131	Sadla Usman	Kessu	7	12
132	Sajida Bibi	Photonindoh	7	12
133	Sajida Bibi	Dargaridani	9	12
134	Asmar Bibi	Sahan Bala	9	12
135	Nasreen Akhtar	Honedahar	9	12
136	Tahlra Bibi	Shahnagar	9	12
137	Zumrat Bibi	Khorandok	9	12
138	Bibi Farida	Khorkashandeh	9	12
139	Iqbal Nisa	Khorkashandeh	9	12
140	Nasreen Perveen	Kalkatak	9	12
141	Rukhusan Perveen	Sahiqutake	7	12
142	Albina Taj	Take Kaldam	7	12
143	Machnaz Jabeen	Singoor	9	12
144	Bibi Fatima	Orghuch	9	12
145	Saira Bibi	Shoghor Ayun	10	12
146	Shahnaz	Broze Kor	9	12
147	Nahid Ara	Dargaridani	7	12
148	Nasim Banu	Shahnagar	9	12
149	Bibi Muhima	Khot (B) ✓	7	12
150	Mehtab Jabeen	Darkhandeh	9	12
151	Badashah Zarin	Denin Lasht	7	12
152	Dil shad Bibi	Melp ✓	7	12
153	Safina Bibi	R/Rech ✓	7	12
154	Mumtaz Bibi	Sonoghur ✓	7	12
155	Sultan Nigar	R/Rech ✓	7	12
156	Margast Bibi	Shahidas ✓	9	12
157	Hasina Bibi	Booni ✓	9	12
158	Muzrifa Bibi	Khot (P) ✓	7	12
159	Nahid Keshwar	Kari	9	12
160	Sartajun Nisa	Juphoor ✓	9	12
161	Zubaida Jehan	Madak Lasht	9	12
162	Zahida Bibi	Moroi Payeen	9	12
163	Baitul Jamal	Goldoor	10	12
164	Kowsar Perveen	Dargaridani	9	12
165	Nargis Begum	Chumurkon	9	12
166	Zubaida Iqbal	Hinjeel	9	12
167	Razia Begum	Bakamak	9	12
168	Shahina Bibi	Drosh	9	12
169	Bibi Saeeda	Kesu Dop	7	12

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S.No.	Name of Teacher	Name of School	BPS	Upgraded scale
170	Saira Narges	Ayun	9	12
171	Laghli Hoor	Moroi Bala	7	12
172	Bibi Javida	Singoor	9	12
173	Mehri Janat	Beshqar	9	12
174	Shakila Hanu	Koghuzi	7	12
175	Bibi Zakia	Homedahar	"	12
176	Sirat Gul	CMS Chumurkon	9	12
177	Zaiba Ghafar	Drosh	9	12
178	Nasima Bibi	Denin Lasht	"	12
179	Abida Kain	Z/Lasht ✓	7	12
180	Hazara Bibi	Sonogor ✓	7	12
181	Zulalkha Bibi	Mustajapandeh	"	12
182	Shamim Noori	Uzun	"	12
183	Zahida Begum	Nishko (P) ✓	9	12
184	Ulbi Sakina	Shagranif. ✓	"	12
185	Misran Bibi	R/Itajhan ✓	9	12
186	Hoor Nisa	Loan ✓	9	12
187	Gulshan Bibi	Awi Booni ✓	9	12
188	Zul Haja Bibi	Nishko (P) ✓	7	12
189	Nasima Bibi	Harchin ✓	9	12
190	Gul Zar Jamal	Istach ✓	9	12
191	Mehrab Gul	Nichagh Ovir ✓	7	12
192	Bibi Saeeda Naz	Goldoor	9	12
193	Jabeen	Broze	9	12
194	Delshad Begum	Kalkatak	7	12
195	Irshad Perveen	Ragh	9	12
196	Khosh Kai	Jinjirate	7	12
197	Sabina Bibi	Prayet	7	12
198	Sardar Bibi	Berir	9	12
199	Sardar Bibi	Parabaig	9	12
200	Khurashad Bibi	Shorghor	7	12
201	Farkhanda Naz	CMS Ayun	9	12
202	Saida Banu	Bashqair Bala	9	12
203	Bibi Ghafrania	Arandu Lasht	7	12
204	Bibi Sadia	CMS (W) ✓	F.A	12
205	Bibi Gul	Parwak ✓	B.A	12
206	Shoukat Ara	Kosht (B) ✓	F.A	12
207	Zar Jamal	Chuinj ✓	7	12
208	Aziz Bibi	Zait ✓	7	12
209	Bibi Sakina	Prayet	9	12
210	Farman Jamal	Gaht ✓	7	12
211	Hamida Bibi	Loankow ✓	7	12
212	Parveen Bibi	Awi Booni ✓	7	12
213	Shamim Akhtar	Booni ✓	7	12
214	Khuban Nisa	Loan ✓	9	12

(21) ✓

S.No.	Name of Teacher	Name of School	BPS	Upgraded scale
215	Jahan Dibi	Arkari	9	12
216	Hasin Banat	Kozhuzl	9	12
217	Safia Kowsar	Sweer	9	12
218	Gul Safat	Arkari	9	12
219	Bibi Maryam	Asper Domil	9	12
220	Fatima Jehan	Barenis	7	12
221	Bibi Jehan Ara	Sahan Bala	9	12
222	Bibi Kamila	Washich ✓	9	12
223	Bibi Arabia	Wirakob ✓	7	12
224	Mohsina Bibi	Shagram ✓	7	12
225	Um-e-Habiba	Nogram ✓	7	12
226	Nuhria Bibi	Charun Owir ✓	7	12
227	Sultania	Sonoghore ✓	9	12
228	Salima Jan	Booni ✓	10	12

Note:

1. Necessary entry to this effect should be made in his/her service book.
2. The award is personal to him/her and later seniority will remain intact.
3. The Degree should be got verified from the concerned University if not already done.
4. The award is subject to discontinuation/deduction of the advance increments if already granted for the said qualification during the previous post.

(MOTASIM BILLAH SHAH)
District Coordination Officer
Chitral

No: 8136-38/E-5

Copy forwarded to the:-

1. EDO, E&SE, Department Chitral for information and necessary action.
2. District Accounts Officer, Chitral
3. Teachers concerned.

District Coordination Officer
Chitral

Zaheer

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S) EDUCATION, CHITRAL.

ENDST: NO 14066-69/B-17/AB/Pry: Dated Chitral, the 12/11/2008

Copy of the above is forwarded to the:-

1. Distt; Co-ordination, Officer, Chitral w/r to his No. 8136-38/E-5 dated 10.11.2008.
2. Distt; Accounts Officer, Chitral.
- 3-4. Dy: Distt; Officer (F) Chitral & Mastuj, for information and necessary action in the matter under intimation to this Office. Necessary entries to should be recorded in the Service Books of the Teachers concerned.

Executive District Officer
(E&S) Education Chitral

OFFICE OF THE DISTRICT COORDINATION OFFICER CHITRALDated Chitral 10th November 2008**Order**

No. 8/35/E-59 (AC). In pursuance of Finance Department, government of NWFP, notification No. FD/SO (FR)10-22/2007 dated 26.01.2008 and as recommended by the DPC in its meeting held on 06.11.2008, sanction is hereby accorded to the grant of upgraded scale BPS-12 and rename as Head Mistress of primary school to the following primary school teachers of education department Chitral with effect from 01.10.2007.

S.No.	Name of teacher	Name of School	BPS	Upgraded Scale
1.	Rahina Shafiq	Lawi	10	12
2.	Bibi Jamila	Walijun	10	12
3.	Bibi Iran	Jughoor	10	12
4.	Pall Naz		10	12
5.	Samina Bibi	Mughaladeh	10	12
6.	Bibi Jan Khunza	Hanedahar	10	12
7.	Bibi Taj	Bakamak	10	12
8.	Tania Bibi		10	12
9.	Rabia Basri	Denin	10	12
10.	Bibi Banazir	Mughalandeh	10	12
11.	Nasim Akhtar	Shaqtak	10	12
12.	Farida Bibi	Kaju	10	12
13.	Tila Bibi	Ayen	10	12
14.	Khurshid Tahan	Ayun	10	12
15.	Sultan Banu	Shoghor	10	12
16.	Razia Sultana	Nshku (P)	10	12
17.	Rahman Jamal	N.Ovir	10	12
18.	Bibi Fatima	Mastuj	10	12
19.	Bibi Saadiq	4 Gram	10	12
20.	Bibi Hawala	Istach	10	12
21.	Noor Jahan	Batamkagh	10	12
22.	Sifat Bibi	Parpish	10	12
23.	Suriya Bibi	Kuragh	7	12
24.	Silufar Sultana	Kessu	10	12
25.	Bibi Amina	G: Chashma	10	12
26.	Nasim Akhtar	Drosh	10	12
27.	Hyder Bibi	Honedahar	10	12
28.	Farzana Yasmeen	G: Chashma	10	12
29.	Hasina Bibi	Thoriandeh	10	12
30.	Razia Khatoon	Drosh	10	12
31.	Yasmeen Bibi	Chumurkon	10	12
32.	Zainab Jamal	Brep	7	12
33.	Rahina Begum	Dizg	10	12
34.	Haji Bibi	Drosh	10	12

35.	Badiul Jamal	Denin	10	12
36.	Sharafatun Nisa	Morol Payeen	10	12
37.	Shahnaz Begum	Chitral	10	12
38.	Ashraf Bibi	Thoriandeh	10	12
39.	Tahira Jabeen	Mughalandeh	10	12
40.	Jehan khorshid	Chitral	10	12
41.	Hamida Bibi	Drosh	10	12
42.	Mehri Zarif	Nishku Bala	10	12
43.	Bibi Zainab	Shagram Dg.	10	12
44.	Sulkha Bib	Mastuj	10	12
45.	Amina Bibi	Madak	10	12
46.	Gulsana	Zait	10	12
47.	Halima Parveen	Kosh Bala	9	12
48.	Jamila Narges	Mustajapandeh	10	12
49.	Najma Sultana	Drosh	10	12
50.	Shamim Ijaz	Deini	10	12
51.	Shahzadi Nargus	Ayun	10	12
52.	Farhad	Broze	10	12
53.	Zianab Bibi	Lash Shishi	10	12
54.	Mehraj Gul	Singoor	10	12
55.	Shamim Akhtar	Mughalandeh	10	12
56.	Tagdeer Jamal	Ayun	10	12
57.	Bibi Shari Zareen	Kushum (P)	10	12
58.	Bibi Hasina	Ayun	10	12
59.	Shahina Bibi	Drosh	7	12
60.	Bibi Zulakikha	Parkusap	10	12
61.	Bibi Khatija	Sarghuz	10	12
62.	Karima Bibi	Reshum Gole	10	12
63.	Shams Bibi	Terich Payeen	10	12
64.	Bibi Sabira	Parpish	10	12
65.	Bibi Shakira	Parcoasb	10	12
66.	Bibi Shahida	Rayeen	10	12
67.	Gul Dana	Moder	10	12
68.	Bibi Salima	G: Chashma	10	12
69.	Najima Farzana	Jughoor	10	12
70.	Nasima Akhtar	Orghuch	10	12
71.	Bibi Abida	Murdan	10	12
72.	Khalida	Take Kaldam	10	12
73.	Tahira	Barenis Payeen	7	12
74.	Bibi Nasreen	Koosht (P)	7	12
75.	Bibi Zahiran	Gohkir	9	12
76.	Bibi Zahida	Charun	7	12
77.	Saeeda Bibi	Jughoor	10	12
78.	Jamila Perveen	Jughoor	10	12
79.	Muslima Qayum	Khorandok	10	12

80.	Essa Jamal	Ayun	10	12
81.	Bibi Musharifa	Bakerabad	10	12
82.	Sultana Bib i	Chitral	10	12
83.	Sharifun Nisa	Bumburate	9	12
84.	Bibi Fatima	Nichagh Ovir	10	12
85.	Qamar Bibi	Khot (B)	9	12
86.	Bibi Rabia	Madak	10	12
87.	Ajab Nigar	Chaun Ower	10	12
88.	Nasreen Biib	Harchin	9	12
89.	Shahnaz Bibi	Reshun	7	12
90.	Noshat Begum	Rhn: Raghan	7	12
91.	Yasmeen	Booni (P)	9	12
92.	Badlul Jamal	Kosht (P)	9	12
93.	Zaibun Nisa	Lone	9	12
94.	Qimat Bibi	CMS (W)	7	12
95.	Farman Bibi	Khot (B)	7	12
96.	Nazook Bibi	Shotkhar	7	12
97.	Bibi Hamida	Ragh rich	10	12
98.	Shahnaz Gul	Chitral	9	12
99.	Shahnaz Bibi	Shalgutak	10	12
100.	Malik Bibi	Chumurkon Koh	10	12
101.	Mehri Nigar	Ashirate	10	12
102.	Fahmina Perveen	CMS Ayun	10	12
103.	Shamim Ara	Parabaig	9	12
104.	Nasreen Jamal	Ariyan	9	12
105.	Nasira Bibi	Barenis	9	12
106.	Nusrat Bibi	Kaju	9	12
107.	Jamshid Bibi	Broze	9	12
108.	Khadija Mastoor	Goldoor	9	12
109.	Farhad Irshad	Singoor	9	12
110.	Zaiba Pari	Broze Goldeh	9	12
111.	Khonza Pari	Drosh	9	12
112.	Narges Banu	Uiak	7	12
113.	Bibi Sharifa	Ariyan	9	12
114.	Narges Bibi	Shali Lasht	9	12
115.	Zeenat Begum	Goldoor	9	12
116.	Mubarak Bib	Toriandeh	7	12
117.	Suraya Bibi	Broze Kor	7	12
118.	Farman Nisa	Sonoghor	9	12
119.	Shamshad Begum	Broze	7	12
120.	Bibi Ayeesha	Mori Payeen	7	12
121.	Bibi Shahida	Tar shishi	7	12
122.	Bibi Amina	Dentn	7	12
123.	Bibi Shamsia	Chitral	7	12
124.	Bibi Maryam	Tar Shishi	7	12

125.	Razia Sultana	Kari	9	12
126.	Misri Jamal	CMS G:Chashma	9	12
127.	Lala Rukh	Uiak	7	12
128.	Baghicha	What	7	12
129.	Shahi Khuban	Goldoon	9	12
130.	Shahida Akhtar	Bakerabad	9	12
131.	Sadiq usman	Kessu	7	12
132.	Sajida Bibi	Phoindeh	7	12
133.	Sajida Bibi	Dargaridani	9	12
134.	Asmar Bibi	Sahan Bala	9	12
135.	Nasreen Akhtar	Honedahar	9	12
136.	Tahira Bibi	Shahnagar	9	12
137.	Zumrat Bibi	Khorandok	9	12
138.	Bibi Farida	Khorkashndeh	9	12
139.	Iqbal nisa	Khorkashndeh	9	12
140.	Nasreen Perveen	Kalkatak	9	12
141.	Rukhsan Perveen	Sahiqutake	7	12
142.	Albina Taj	Take Kaldam	7	12
143.	Mahnaz Jabeen	Singoor	9	12
144.	Bibi Fatima	Orghuch	9	12
145.	Saira Bibi	Shoghor Ayun	10	12
146.	Shahnaz	Broze Kor	9	12
147.	Nahid Ara	Dargaridani	7	12
148.	Nasim Banu	Shahngar	9	12
149.	Bibi Muhima	Khot (B)	7	12
150.	Mehtab Jabeen	Khorkashndeh	9	12
151.	Badashah Zarin	Denin Last	7	12
152.	Dil Shad Bibi	Melp	7	12
153.	Safina Bibi	R/Rech	7	12
154.	Mumtaz Bibi	Sonoghur	7	12
155.	Sultan Nigar	R/Rech	7	12
156.	Margast Bib i	Shahidas	9	12
157.	Hasina Bib i	Booni	9	12
158.	Muzrifa Bib i	Khot (P)	7	12
159.	Nahid Keshawar	Kari	9	12
160.	Sartajun Nisa	Jughoor	9	12
161.	Zubaida Jehan	Madak lasht	9	12
162.	Zahida Bibi	Moroi Payeen	10	12
163.	Batiul Jamal	Goldoor	9	12
164.	Kowsar Perveen	Dargaridani	9	12
165.	Nargis begum	Chumurkon	9	12
166.	Zubaida Iqbal	Hinjeel	9	12
167.	Razia Begum	Balamak	9	12
168.	Shahina Bibi	Drosh	9	12
169.	Bibi Saeeda	Kesu Dop	7	12

170.	Saira Narges	Ayun	9	12
171.	Laghli Hoor	Moroi Bala	7	12
172.	Bib Javida	Singoor	9	12
173.	Mehri janat	Beshqar	9	12
174.	Shaika Banu	Koghuzi	7	12
175.	Bibi zakia	Honedahar	9	12
176.	Slasat Gul	CMS Chumurkon	9	12
177.	Zaiba Ghafar	Drosh	9	12
178.	Nasima Bibi	Denin Lasht	9	12
179.	Abida Kala	Z/Lasht	7	12
180.	Hazara Bibi	Sonogur	7	12
181.	Zulakha Bibi	Mstajpandeh	9	12
182.	Shamim Nuli	Ulai	9	12
183.	Zahida Begum	Nishko (P)	9	12
184.	Bibi Sakina	Shagram/L	9	12
185.	Mistam bibi	R/Raghan	9	12
186.	Hoor Nisa	Loan	9	12
187.	Gulshan Bibi	Awi Booni	9	12
188.	Zul Haja Bibi	Nishko (P)	7	12
189.	Nasima Bibi	Harchin	9	12
190.	Gul Zar Jamal	Istach	9	12
191.	Mehrab Gul	Nichagh Ovir	7	12
192.	Bibi Saeeda Naz	Goldoor	9	12
193.	Jabeen	Broze	9	12
194.	Delshad Begum	Kalkatak	7	12
195.	Irshad Perveen	Ragh	9	12
196.	Khosh Kai	Jinjirate	7	12
197.	Sabina Bibi	Prayet	7	12
198.	Sardar Bibi	Berir	9	12
199.	Sardar Bibi	Parabaig	9	12
200.	Khurashad Bibi	Shoghor	7	12
201.	Farkhanda Naz	CMS Ayun	9	12
202.	Saida Banu	Bashqair Bala	9	12
203.	Bibi Ghafrania	Arandu Lasht	7	12
204.	Bibi Sadia	CMS (W)	F.A	12
205.	Bibi Gul	Parwak	B.A	12
206.	Shoukat Ara	Kosht (B)	F.A	12
207.	Zar Jamal	Chuinj	7	12
208.	Aziz Bibi	Zait	7	12
209.	Bibi Sakina	Prayet	9	12
210.	Farman Jamal	Gaht	7	12
211.	Hamida Bibi	Loankow	7	12
212.	Parveen Bibi	Awi Booni	7	12
213.	Shamim Akhtar	Booni	7	12
214.	Khuban Nisa	Loan	9	12

215.	Janan Bibi	Arkari	9	12
216.	Hasin Banat	Kozhuzi	9	12
217.	Safia Kowsar	Sweer	9	12
218.	Gul Safat	Arkari	9	12
219.	Bibi Maryam	Asper Domil	7	12
220.	Fatima Jehan	Barens	9	12
221.	Bibi Jehan ara	Shah Bala	9	12
222.	Bibi Kamila	Washich	7	12
223.	Bibi Arabia	Wirkob	7	12
224.	Mohsina Bibi	Shagram	7	12
225.	Um-e-Habiba	Nogram	7	12
226.	Nuhria Bibi	Charun Owir	9	12
227.	Sultania	Sonoghore	10	12
228.	Salima Jan	Booni	10	12

Note:

1. Necessary entry to this effect should be made in his/her service book.
2. The award is personal to him/her and inter seniority will remain intact.
3. The degree should be got verified from the concerned university if not already done.
4. The award is subject to discrimination/deduction of the advance increment if already granted for the said qualification during the previous post.

MOTASHIM BILLAH SHAH
District coordination officer
Chitral

No. 8136-38/E-5

Copy forwarded to the :

1. EDO, E&SE Department Chitral for information and necessary action.
2. District Accounts officer, Chitral
3. Teachers concerned.

District coordination officer
Chitral

OFFICE OF THE EXECUTIVE DIST: OFFICER (E&S) EDUCATION, CHITRAL

Endst No. 14066-69/B-17/AB/pry:

dated Chitral the 12/11/2008

Copy of the above is forwarded to the :

1. Distt: Coordination, officer, Chitral w/r to his No. 8136-38/E-5 dated 10.11.2008.
2. Distt: Accounts Officer, Chitral
- 3-4 Dy: Distt: officer (F) Chitral & Mastuj, for information and necessary action in the matter under intimation to this office.
Necessary entries to should be recorded in the service books of the teachers concerned.

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(12)



**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**
Dated Peshawar, the 07-12-2010.

ORDER.

NO.SO(PE)5-2/03/IPT/Chitral.

In pursuance of the Establishment and Administration Department Govt. of Khyber Pakhtunkhwa NOC, contained in letter No. SOR-I(E&AD)1-14/82/Vol.XX dated 03-12-2010, the services of Mst. Nasima PST GGPS Harchina District Chitral (Khyber Pakhtunkhwa) are hereby placed at the disposal of the Federal Directorate of Education Islamabad on deputation basis for initial period of three (03) years, on usual terms & conditions.

SECRETARY TO GOVT. OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT.

Endst. No. & Date as above.

Copy forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa Establishment Department w/r to his letter No. quoted above.
2. The Administrative Officer (F) Government of Pakistan, Federal Directorate of Education Islamabad w/r to his letter No. F. 1-9/2010-(Dep)(W)/FDE/ dated 24th November, 2010
3. The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. The Distt. Accounts Officer Chitral.
5. The Executive Distt. Officer Elementary & Secondary Education Chitral with the request to relieve the teacher concerned and direct her to report for duty to the Federal Directorate of Education Islamabad for further adjustment.
6. Mst. Nasima PST GGPS Harchina District Chitral.

SECTION OFFICER (PRIMARY)

No. F. 01-09/2010(W) FDE
Government of Pakistan
Federal Directorate of Education

(C) (13)

Islamabad the 01st March, 2011

OFFICE ORDER

Consequent upon relieving of Mrs. Nasima Bibi, Primary School Teacher (BS-09) Government Girls Primary School, Harchina, District Chitral from her parent department i.e. Education Department, KPK vide letter No. SO (PE) 5-2/03/IPT/Chitral, dated 07.12.2010 taken on deputation basis as Matric Trained Teacher (BPS-09) initially for a period of three years or till the joining of a regular appointee, which ever is earlier, is hereby posted at Federal Government Girls Middle School, Bain Nala (FA) Islamabad vice Mrs. Yasmeen Ashraf, MTT (BS-09) transferred and allowed to join her duty with effect from 20/01/2011.

- 2 No TA/DA will be paid in this connection.
- 3 This is issued with the approval of Director General (Education).

(RIASAT ALI)
ADMN. OFFICER (FEMALE)

Copy to:

- o The AGPR, Islamabad.
- o The Section Officer, (SE-IV) School Education Department, Peshawar, KPK.
- o The Head concerned.
- o The Person concerned.
- o The Personal File.

(RIASAT ALI)
ADMN. OFFICER (FEMALE)

D/M Ishaq Khan/Drafts

REHANA ABID NAZIR
C.D.O./Headmistress
I.M.S.G (I-VIII) Bain Nala
(F.A), Islamabad
ID 8719

(8)

(14)

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

OFFICE ORDER

In pursuance of Elementary & Secondary Education Department Government of Khyber Pakhtunkhwa Peshawar vide No. SO (B&A)1-18/E&SE/2012 dated 11.07.2012 and approval of the Departmental Selection/Promotion Committee vide No. 27714-20 dated 24.12.2012. Sanction is hereby accorded to the up gradation/promotion of Primary School Head Teacher (Female) BPS-14 to BPS-15 with effect from 01.07.2012.

SNo	Seniority No	Name of Teacher	Place of duty	Designation
1	1	Raihana Shafqat, PST	GGPS:Lawi.	PSHT
2	3	Samina Bibi, PST	GGPS Khorkashandeh	PSHT
3	5	Bibi Benazir, PST	GGPS:Kore Broze.	PSHT
4	6	Pali Naz, PST	GGPS: Singoor Lot Deh.	PSHT
5	7	Nasim Akhtar, PST	GGPS:Bakamak.	PSHT
6	8	Farida Bibi, PST	GGPS:Ragh.	PSHT
7	9	Bibi Taj, PST	GGPS:Bakamak.	PSHT
8	10 ✓	Bibi Jamila	GGPS Washich	PSHT
9	11	Tila Bibi, PST	GGPS:Throiandeh	PSHT
10	12	Khurshid Jahan, PST	GGCMS:Ayun	PSHT
11	14	Sultan Banu, PST	GGPS: Shoghore.	PSHT
12	15 ✓	Rahima Begum	GGPS Chuinj	PSHT
13	16 ✓	Bibi Sadia	GGPS Z/Gram	PSHT
14	17 ✓	Bibi Rahman Jamal	GGPS Reshun	PSHT
15	18 ✓	Sifat Bibi	GGPS:Zayet	PSHT
16	20 ✓	Noor Jehan	GGPS Drungagh	PSHT
17	21	Nasim Akhtar, PST	GGCMS:Jinjirate.	PSHT
18	22	Farzana Yasmeen, PST	GGPS:What.	PSHT
19	23	Hasina Bibi, PST	GGPS Ayun Muldeh.	PSHT
20	24	Razia Khatoon, PST	GGPS:Drosh	PSHT
21	25	Haji Bibi, PST	GGPS:Beori Bala.	PSHT
22	27	Yasmeen Bibi, PST	GGPS:Chumarkone Kuh	PSHT
23	29	Sharafatun Nisa PST	GGCMS:Mori Bala.	PSHT
24	30	Shahnaz Begum, PST	GGPS:Seen Lasht.	PSHT
25	33 ✓	Razia Sultana	GGPS Charun	PSHT
26	35 ✓	Jahan Khurshid	GGCMS:Mori Bala.	PSHT
27	36 ✓	Bibi Shahnaz	GGPS Khot Bala	PSHT

Attested
Zahida Perveen
Zahida Perveen, Dy. S.O.
D.D.O (Headmistress)
ISLAMABAD MODEL SCHOOL FOR GIRLS
(VIII) Bain Nala (P.A), Islamabad.
10-1236

FORM

BASIC INFORMATION FOR PAY VERIFICATION (SERVICE BOOK)

(to be attached with each service book)

S.NO.	REQUIRED INFORMATION
1	Name of official: Nasims Bibi.
2	Designation : PST
3	Basic Pay Scale (Current): (15)
4	CNIC NO. (NADRA) : 15202-2106455-4
5	Personnel Number (AGPR) : 00327496
6	Vendor Number (SCHOOL)AGPR : 30005506
7	Vendor Number of Official : <u>30156855</u>
8	DDO Code / Cost Center: ID8719
9	Name and Designation of Authorized Attestation Officer:

Reference No. (Personal File) PF/NB/PSHT/2014

Date 22-10-2014

Zahide Agho

ID8719

1 NAME OF POST ملازمت کا نام	2 Whether sub- stantive or officiating, and whether permanent or temporary ملازمت کی نوعیت (i) اس کی ہے یا نا تمام (ii) مستقل ہے یا نا تمام	3 ii officiating State— (i) substantive appointment or (ii) whether service counts for pension under rule 3 20 of C.S.R. (Pb.) Volume II گزشتہ ملازمتوں پر پوسٹاں کا سروس کا حساب لگانے کے لیے کیا اس ملازمت کو اس سروس کا حساب لگانے کے لیے رول 3 20 کے تحت درجہ اول میں درجہ اول میں	4 Pay in sub- stantive post اس ملازمت کی تنخواہ Rs. Ps.	5 Additional Pay for officiating تعمیری ملازمت پر میں اضافی تنخواہ Rs. Ps.	6 Other emolu- ments falling under the term "Pay" تنخواہ کے تحت پوسٹ کے تحت یا نہ	7 Date of appoint- ment تاریخ تعمیری
Revised Entry						
BPS-16 8500-700-29500			13400/-			12/2012
			12700/-			12/2012
			13400/-			12/2012
<div style="border: 1px solid black; padding: 5px;"> <p>Checked and verified by On 1-7-2013 at Rs. 8500-700-29500 with next increment 1-12-2013</p> <p style="text-align: right;">Asstt. Accounts Officer</p> <p>Errors/omissions (if any) will be 12/13</p> </div>						
BPS-15 (8500-700-29500)			12700/-			07/2012
do			13400/-			12/2013
<p>The official is the employee of the govt. and undertaken his regular duties in Federal Govt. He belongs to</p>						


Signature of Government servant	the Office or other Attesting Officer in attestation of columns 1 to 8	Date of termination of appointment	tion (such as promotion, transfer, dismissal etc.)	Head of the Office or other Attesting Officer	and duration of leave taken	leave not exceeding 120 days, for which leave salary is debitable to an other Government.	the Office of the Attesting Officer	Censure, or reward or praise of the Government Servant
سید محمد علی خان کے دستخط	سربراہ دفتر یا کسی افسر کے دستخط کے اندراجات کے سلسلے میں	تاریخ انقطاع ملازمت	وجہ انتقال ملازمت پر موقتی ریٹائرمنٹ	سربراہ دفتر یا کسی افسر کے دستخط	میں اور میری زوجت نے	کسی دیگر حکومت کے کھاتے میں قابل بھرائی جائزہ تک کی خدمت میں کسی اور حکومت کے دستخط	سربراہ دفتر یا کسی افسر کے دستخط	تقدیر یا تعریف یا نکتہ یا نکتہ
					Period	Government to which debitable		

Sanction is hereby accorded
 15/12/2012
 Sub Divisional Education Officer (Female) Muzaffargarh
 Chitral Endst No. 81223-27 dated 26-12-2012 at S.No. 170.

OPTION
 I do hereby opt for re-fixation of my pay in lower scale after earning (A) increment on 1/12/2012

Nasrullah
 Nazmia Bitchi

Zahida Agha
 Nazmia
 ISLAMABAD MODEL SCHOOL, NAZIMIA (P.W.II) Block Nala (P.A.), Islamabad. ID-7230
 Head-Department
 Revised from the date of graduation of post insured 2/12/2012
 20/12/2012

1 NAME OF POST ملازمت کا نام	2 Whether sub- stantive or officiating, and whether permanent or temporary ملازمت کی نوعیت ذاتی یا ترقیاتی یا مستقل ہے یا جاری	3 If officiating State— (i) substantive appointment or (ii) whether service counts for pension under rule 320 of C.S.R. (Pb.) Volume II اگر ترقیاتی ملازمت ہے تو اس کی طرف کا کوئی راجحہ ہے اور یہ کیسے بھیج دیا جائے گا اور اس میں روزانہ ملازمت کے حساب سے کے مطابق پیش کر دینا ہے	4 Pay in sub- stantive Post اساسی ملازمت کی تنخواہ	5 Additional Pay for officiating ذاتی ملازمت کی تنخواہ میں اضافی تنخواہ	6 Other emolu- ments falling under the term "Pay" تنخواہ کے تحت میں شامل ہونے والی دیگر یاقت	7 Date of appoint- ment تقریری
B/S 1573 8570 - 700 - 28520			12700/-		17 2812	
			13400/-		116 1212	
			14100/-		112 2013	
			14800/-		112/2014	
<h1>Revised Entries</h1>						
<p>Allowed one premature leave for up to 7 days - vide No. F.D. SO (So-SRC) 125/2014 datd 30/3/2014</p>						
<p> SDEO (F) Mastuj</p>						
B/S 9R 31852-190-8885		50	52857 /		11/7/07	
			52757 /		11/12/07	
B/S 12R 3620-260-11430			54501 /		11/10/07	
			57101 /		11/10/07	
B/S 12R 4555-200-11655			56389 /		11/7/08	
			57114 /		11/12/08	

Signature of Government servant	Signature of the Office of other Attesting Officer in attestation of columns 1 to 8	Date of termination of appointment	Reason for termination (such as promotion, transfer, dismissal etc.)	Head of the Office or other Attesting Officer	Period and duration of leave taken	Leave not exceeding 120 days for which leave salary is debit to another Government.	Signature of the Office of the Attesting Officer	Censure, or reward or praise of the Government Servant
کے دستخط	سربراہ دفتر یا دیگر سربراہ کے دستخط کے ذریعے	تاریخ اختتام ملازمت	وجہ اختتام علامت پرستی برقی یا دیگر	سربراہ دفتر یا کسی انسپکٹور کے دستخط	میں بار و مدت	کسی دیگر حکومت کے لیے قابل عہدہ جاریہ کی وجہ سے یا کسی اور کے لیے	سربراہ دفتر یا کسی انسپکٹر کے دستخط	تادیب یا تعریف یا پرائز کا حکم
					Period	Government to which debitible		
	SDEO (F)	12/15		SDEO (F)				
	Mastuj	30/11/2013				one increment for up gradation vide Notification No. P.O. So (P.C) 11-2/17		
	SDEO (F)	30/11/2014						
	Mastuj	30/11/14					Sub Divisional Education Officer (Female) Mastuj, Bat Bogni, (Chitral)	
	SDEO (F)	11/11/14						

option

I do hereby opt for the fixation of my pay in lower scale after earning (A) increment on 1/12/2007

SDEO (F)
Mastuj

No.F.1-9/168-MTT (Deputationist) FDE
Government of Pakistan
Federal Directorate of Education
Islamabad

(E) (16)

Islamabad, the 11th February, 2014

Section Officer (Primary),
Elementary & Secondary Education Department,
Govt. of Khyber Pakhtunkhwa,
Peshawar.

Subject: **REQUEST FOR EXTENSION IN DEPUTATION PERIOD IN RESPECT OF MRS. NASIMA BIBI, MTT (DEPUTATIONIST)**

I am directed to refer to the captioned subject and to say that Mrs. Nasima Bibi, PST, Government, Girls Primary School, Harchin District, Chitral was taken on deputation as Matric Trained Teacher (MTT), BPS-09 under Federal setup for a period of 03-years vide this Directorate's office order No.F.1-9/2011 (W) FDE dated 01.03.2011. Now, she has requested for further 02-years extension in deputation from 20.01.2014 to 19.01.2016.

2. Therefore, it is requested that NOC / Consent about her further extension in deputation may kindly be communicated to this Directorate for further necessary action, please.

3. This is issued with the approval of Deputy Director Schools (Female).

(Muhammad Aslam Ansari)
Admin. Officer (Female)

Copy to:

- Principal, Islamabad Model School for Girls (I-VIII), Bain Nala. (FA). Islamabad.
- Person concerned.
- Persona file.

(Muhammad Aslam Ansari)
Admin. Officer (Female)

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No. ^{D-4} D.935-36 / FNo. ~~04~~ / EBF,

Dated Chitral the 05 / 04 / 2014.

From:

The District Education Officer,
(Female) Chitral.

To,

The Director,
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Subject:

REQUEST FOR EXTENSION IN DEPUTATION PERIOD

Memo:-

Kindly refer to your Memo: No. 1759/FNo.3/IPT/Peshawar dated 12-03-2014 on the subject cited above.

It is requested that we have no objection for extension of deputation period with effect from 20-01-2014 to 19-01-2016 for Two (2) years in respect of Mst: Nasima Bibi PST Govt: Girls Primary School Harchin Chitral.

Endst: No. 935-36 /

5/9/2014

edl
District Education Officer,
(Female) Chitral.

Copy forwarded for information to the :-

1. Deputy Directress (F) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Mst: Nasima Bibi PST C/O Principal Islamabad Model Schgool for Girls (I-VIII) Bain Nala(FA) Islamabad.

[Signature]
District Education Officer,
(Female) Chitral.

18

No. D.935-36 / FNo. 04 / EBF,

Dated Chitral the 05 / 04 / 2014.

From:

The District Education Officer,
(Female) Chitral.

To,

The Director,
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Subject:

REQUEST FOR EXTENSION IN DEPUTATION PERIOD

Memo:-

Kindly refer to your Memo: No. 1759/FNo.3/IPT/Peshawar dated 12-03-2014 on the subject cited above.

It is requested that we have no objection for extension of deputation period with effect from 20-01-2014 to 19-01-2016 for Two (2) years in respect of Mst: Nasima Bibi PST Govt: Girls Primary School Harchin Chitral.

Endst: No. 935-36

edl
District Education Officer,
(Female) Chitral.

8/9/2014

Copy forwarded for information to the :-

1. Deputy Directress (F) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Mst: Nasima Bibi PST C/O Principal Islamabad Model Schgool for Girls (I-VIII) Bain Nala (FA) Islamabad.

[Signature]
District Education Officer,
(Female) Chitral



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) UPPER CHITRAL.
PHONE NO.0943470363

(F) (19)



OFFICE ORDER:

With reference to the Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar, letter No. SO (PE)5-2/IPT/Chitral/Mst.Naseema Bibi PSHT/2014 Dated Peshawar the 21.07.2020.

Mst. Naseema Bibi, PSHT is hereby adjusted against vacant post at GGPS Ragh Rech with immediate effect in the best interest of public service.

Note:

1. No TA/DA is allowed.
2. Charge Report should be submitted to all concerned.

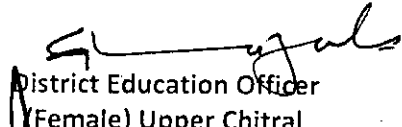
(GHAZALA ANJUM)
District Education Officer
(Female) Upper Chitral

Endst No: 1868-73/FNo.EB (F) A/P-01

Dated Upper Chitral the 07 / 8 /2020

Copy of the above is forwarded for information to the:

1. Section Officer (PRIMARY) Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar with reference No. & dated as above.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Monitoring Officer Upper Chitral.
4. District Accounts Officer Chitral.
5. Sub Divisional Education Officer (Female) Torkhow Mulkhow Upper Chitral.
6. Teacher concerned.


District Education Officer
(Female) Upper Chitral

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OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) UPPER CHITRAL.
PHONE NO.0943470363



OFFICE ORDER:

Mst. Naseema Bibi, PST is hereby adjusted against vacant post at GGPS Reshun Gole with immediate effect in the best interest of public service.

Note:

1. No TA/DA is allowed.
2. Charge Report should be submitted to all concerned.


(GHAZALA ANJUM)
District Education Officer
(Female) Upper Chitral

Endst No: 1829-35/FNo.EB (F) P/C-01

Dated Upper Chitral the 18 / 8 / 2020

Copy of the above is forwarded for information to the:

1. Section Officer (PRIMARY) Elementary and Secondary Education Department Khyber Pakhtunkhwa Peshawar with reference No. & dated as above.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Monitoring Officer Upper Chitral.
4. District Accounts Officer Chitral.
5. Sub Divisional Education Officer (Female) Mastuj at Booni Upper Chitral.
6. Teacher concerned.


District Education Officer
(Female) Upper Chitral



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**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) UPPER CHITRAL.
PHONE NO.0943470363**



OFFICE ORDER:

Reference to the office sanction of Mst. Naseema Bibi, BPS-12 to BPS 15 order No. 21023-27 dated 26/12/2012 Issued vide EDO (Elementary and Secondary Education Department) Chitral, is hereby withdrawn with immediate effect.

(GHAZALA ANJUM)
District Education Officer
(Female) Upper Chitral

Endst No: 1824-25 No.EB (F) P/C-01

Dated Upper Chitral the 18 / 8 / 2020

Copy of the above is forwarded to the:

1. SDEO (F) Torkhow Mulkhow.
2. Teacher concerned.

(Signature)
District Education Office
(Female) Upper Chitral

(H)

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بخدمت: جناب ڈائریکٹر صاحب ایڈمیٹری اینڈ سیکنڈری ایجوکیشن خیبر پختونخواہ، پشاور۔

مضمون: اپیل برائے Restoration PSHT (B-15) پوسٹ

جناب والا!

گزارش ہے۔ کہ ندویہ مورخہ 2 دسمبر 1995ء کو PST پوسٹ میں اپائنٹ ہوئی تھی اور مورخہ 26 دسمبر 2012ء کو ایگزیکٹو ڈسٹرکٹ ایجوکیشن آفیسر ایڈمیٹری اینڈ سیکنڈری ایجوکیشن چترال کی آفیس آرڈر نمبر 27-21023-27 کے تحت ندویہ کو (PSHT B-15) میں پروموشن ہوئی تھی (آرڈر کی کاپی لف ہے)۔ اور اس وقت کی SDEO (Female) Mastuj District Chitral نے Pay fixation کیلئے مجھ سے Option لیکر میری Pay فیکسیشن بھی کی تھی (سروس بک کی کاپی لف ہے)۔

جناب والا! مورخہ 6 مارچ 2020ء کو Federal Directorate of Education Government of Pakistan, Islamabad کے آرڈر نمبر F.1-9/168 EST.(D) FDE کے تحت ندویہ کی Parent Department میں ٹرانسفر ہو گئی ہے۔ اور ندویہ یکم اپریل 2020ء کو اپنی ڈسٹرکٹ میں چارج لیکر ڈیوٹی انجام دے رہی ہے۔ جناب والا مورخہ 18 اگست 2020ء کو ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ (فیمل) آپر چترال نے ندویہ کی پروموشن (PSHT (B-15) آرڈر نمبر 27-21023 مورخہ 26 دسمبر 2012ء کو ایڈمنسٹریٹو سزا کے withdraw کر کے (PST (B-12) میں ایڈجسٹ کی ہے (کاپی لف ہے)۔ جس کی وجہ سے ندویہ کی دو پروموشن Sr.PST (B-14) and PSHT (B-15) متاثر ہو رہی ہیں اور میرے ساتھ تقرر شدہ ٹیچر بھی Sr. CT (B-16) میں پروموشن لے چکی ہیں۔ اور ندویہ کی پہلے ہی سے دو پروموشن متاثر ہو چکی ہیں اب مزید دو متاثر ہونے کی وجہ سے کل 4 متاثر ہو رہی ہیں۔ (جیسا کہ Sr.PST (B-14), PSHT (B-15), CT (B-15) and Sr. CT (B-16)

لہذا انجناب سے اپیل ہے۔ کہ ندویہ کی مذکورہ بالا PSHT پر پروموشن آرڈر مورخہ 26-12-2012 کو بحال کرنے کیلئے ڈسٹرکٹ ایجوکیشن آفیسر (فیمل) آپر چترال کو ہدایت کر کے مشکور و ممنون فرمائیں۔

ندویہ ہمیشہ کیلئے اچھا دعا گو رہے گی۔

فقط
Nasir

نسیہ بی بی (PSHT (B-15)

GGPS Harchin

District Upper Chitral

Date: 23/10/2021

Contact No, 0340-7084011

No 1816
2-3-2-2-21
عادل

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C.M No. _____-P/2021 IN Service Appeal No. _____/2021

Naseema Bibi

Versus

The Secretary, Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar

**APPLICATION FOR AND ON BEHALF OF THE APPELLANT FOR
THE SUSPENSION OF THE ORDER DATED 18.08.2021 ISSUED BY
THE DISTRICT EDUCATION OFFICER (FEMALE) UPPER CHITRAL
TILL THE DECISION OF THE INSTANT APPEAL**

Respectfully sheweth;

The appellant most earnestly craves permission of this Hon'ble Tribunal to submit as under;

1. That, the appellant has filed the accompanied Appeal wherein no date of hearing has been fixed so far.
2. That, the contents of the said Appeal may be read as integral part of this application.
3. That, the appellant has prima facie case and the balance of convenience also lies in their favor.
4. That, in order to save the appellant from further suffering due to the operation of the Office Order dated 18.08.2021 issued by the District Education Officer (Female) Upper Chitral wherein the Promotion Order of the Appellant to BPS-15 has been withdrawn, may kindly be suspended till the final disposal of the instant appeal.

It is, therefore, most humbly prayed that impugned Office Order dated 18.08.2020 issued by the District Education Officer, Upper Chitral may kindly be suspended till the final disposal of the Appeal.

Dated: 01.09.2020

Through

APPELLANT


SHAHID ALI YAFTALI
 Advocate High Court (s)

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C.M. No. _____ in Service Appeal No. _____/2021

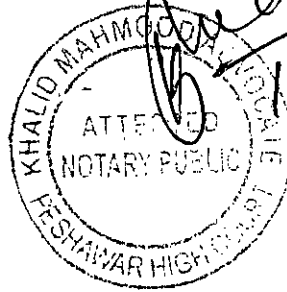
Naseema Bibi

Versus

**Secretary Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar**

AFFIDAVIT

I, **Naseema Bibi** D/O Noor Alam Khan currently posted at Government Girls Primary School Harchina, Upper Chitral do hereby solemnly affirm and declare on oath that the contents of the accompanying application for suspension are true and correct to the best of my knowledge and nothing has been concealed from this Hon'ble Court.



DEPONENT
CNIC No.15202-2106455-4

BEFORE THE KHYBER PUKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

CM _____ in Service Appeal No. _____/2021

Naseema Bibi

Versus

**Secretary Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar**

Application for Condonation of Delay

Respectfully sheweth;

The Petitioner seeks the Tribunal's permission to submit as under:

1. That, the titled case is being filed before the Hon'ble Tribunal and no date has been fixed in the title Appeal.
2. That, the Petitioner is a female teacher, hailing from Upper Chitral. She has recently been transferred to Chitral has been repeatedly transferred.
3. That, the Petitioner is suffering from a serious mental ailment and has been under treatment for more than five years.
4. That, the Petitioner was unable to follow up on this Service Appeal as she struggled with stabilizing her son upon the frequent changes in her posting.

It is therefore most humbly submitted that the titled Appeal may kindly be admitted on humanitarian grounds.



Petitioner

Through

Dated 08.09.2021


Shahid Ali Yaftali

Advocate High Court (s)

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

C.M. No. _____ in Service Appeal No. _____/2021

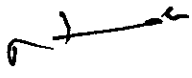
Naseema Bibi

Versus

Secretary Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar

AFFIDAVIT

I, **Naseema Bibi** D/O Noor Alam Khan currently posted at Government Girls Primary School Harchina, Upper Chitral do hereby solemnly affirm and declare on oath that the contents of the accompanying application for suspension are true and correct to the best of my knowledge and nothing has been concealed from this Hon'ble Court.


DEPONENT
CNIC No.15202-2106455

BEFORE THE KHYBER PUKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. _____/2021

Naseema Bibi

Versus

Secretary Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar

MEMO OF ADDRESSES

APPELLANT

Naseema Bibi D/O Noor Alam Khan, Government Girls Primary School,
Harchina, District Upper Chitral.

RESPONDENTS

1. **Secretary** to the Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Department, Peshawar, Civil Secretariat, Peshawar
2. **Director, Elementary and Secondary Education Department,** Khyber Pakhtunkhwa, Civil Secretariat, Peshawar
3. **District Educational Officer, (Female)** Upper Chitral, Chitral City, Near C&W, Upper Chitral


COUNSEL

تعداد: 50 روپے

95519

ACEEL AHMAD

ایڈوکیٹ:

بار کونسل/ ایسوسی ایشن نمبر: 68590

رابطہ نمبر: 0314 4513979



پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

مخائب: Appellant

دعویٰ: Service Appeal

Nareema Bibi

علت نمبر:



مورخہ:

جرم:

تھانہ:

باعت تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
آن مقام حاکم عدلیہ عقیل بوسیلے حاضر ہوا اور کوویل مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرہے 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 اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کارروائی کے واسطے ادروکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے لفر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جاندا اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم:

مقام پشاور کے لیے منظور ہے۔

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

SHAHID YAFALI

Handwritten signature

15202 21064554

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. 7395/2021

Naseema Bibi D/O Noor Alam Khan, Currently posted at GGPS
Harchin, District Chitral Upper.. (Appellant)


Versus

1. Secretary, Elementary and secondary Education Khyber
Pakhtunkhwa Peshawar
2. Director, Elementary and secondary Education Khyber Pakhtunkhwa
Peshawar.
3. District Education Officer (F) Chitral Upper.

(Respondents)

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District Education Officer Female
District Chitral Upper
Respondent No.5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. 7395/2021

Naseema Bibi D/O Noor Alam Khan, Currently posted at GGPS
Harchin, District Chitral Upper.. (Appellant)

Versus

1. Secretary, Elementary and secondary Education Khyber Pakhtunkhwa Peshawar
2. Director, Elementary and secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (F) Chitral Upper.

(Respondents)

PARA WISE COMMENTS ON BEHALF OF RESPONDENT No. 1 to 3.

Respectfully sheweth:-

PRELIMINARY OBJECTIONS

1. That the Appellant is not the "aggrieved" persons within the meaning of Article 212 of the Constitution of the Islamic Republic of Pakistan 1973.
2. That the Appellant has got no cause of action /locus standi to file this Service Appeal because the Appellant did not come on merit.
3. That the Appellant has not come to this Honorable court with clean hands rather than the instant appeal is mainly based on Malafide intentions just to put pressure on the respondent department for illegal restoration of service.
4. That the Appellant is estopped by his own conduct.
6. That the instant Service Appeal suffers from laches, hence not maintainable in the present form.
7. That the appeal in hand is barred by the relevant provision of Law/Rules/Policy in Field.
8. That the appellant was on deputation for a period of five years up to 19-01-2016, and after expiry of her deputation she did not return back to her parent department on time.
9. That after promotion of the appellant to PSHT BPS-15 she did not ~~take~~ take over charge with in time.

ON FACTS.

1. Para -1 of the facts pertains to the appellant service record, hence need no comments.
2. Para -2 of the facts pertains to record, hence need no comments
3. Para-03 of the facts is correct to the extent of placement of services of the appellant at the disposal of the Federal Directorate of Education Islamabad on deputation basis for a period of three years.
4. Para-04 of the facts pertains to records needs no comments.
5. Para-05 of the facts is correct that the appellant was promoted from PST BPS-12 to PSHT BPS-15 on the basis of seniority cum fitness, however she did not take over charge of her Post within time and remained on deputation for further four years. She was demoted back to BPS-12 on 18.08.2020 when she completed her one colander year service she was promoted to BPS-14. Recently her file is already being put up from BPS-14 To BPS -15 purely on seniority based.
6. Para-06 of the facts is incorrect, it is submitted that the appellant was on deputation for a period of three years and as per deputation rules, later on was extended for another two years w.e.f 20-01-2014 to 19-01-2016 . After expiry of the deputation period of five years she was bound to return and join her parent department in which she failed. It is also pertinent to mention here that the appellant remained absent w.e.f 19-01-2016 till re adjustment dated 07-08-2020, for which proceeding has been initiated against her.**(Copy of the letter dated 11-10-2022 for inquiry officer regarding the deputation period and promotion of the appellant is attached as "A")**
7. Para-07 of the facts is incorrect, hence denied in fact she was required to join her parent department after expiry of her deputation period i.e 19-01-2016. she did not return back, meanwhile requested Federal Directorate of Education for another extension which was against law and rules, and vide letter dated 03-09-2019, the request was rejected with the

direction that the lady teacher had already been completed her five years deputation period and there is no provision to further extend her deputation period as per deputation policy of this province. It is also pertinent to mention here that the appellant remained will full absent and did not joined her parent department within time. However after rejection of third extension she requested for re adjustment in her parent department and in compliance of the letter dated 21-07-2020 she was adjusted while in compliance of letter dated 02-09-2020 she was also directed to provide the relevant records of deputation as well as of the intervening period. **(Copy of the letter dated 21-07-2020 is attached as "B", copy of the letter dated 02-09-2020 is attached as "C" and Copy of letter dated 10-09-2020 for providing of relevant record is attached as "D" copy of the letter dated 03-09-2019 regarding rejection for extension of deputation of the appellant is attached as "E").**

8. Para-8 of the facts Pertain to record, however her promotion order was withdrawn as per law, as she was promoted to the post of PSHT vide promotion order dated 26-12-2012 and she did not join nor took over charge of her post with in time. Resultantly her promotion order of the appellant order was withdrawn.
9. Detail reply has been submitted in the above Para's.
10. The appellant has got no cause of action to file instant appeal.

GROUND

A) In correct, hence denied. The respondent always followed rules and policies in letter and spirit, whereas the appellant did not ~~took~~ over of her charge well on time and there is no rules or policy for charge taking after laps of about 9 years. And as per section **IV** sub section "**d**", the civil service on deputation to federal government, provincial government, and autonomous/semi A autonomous organization shall be considered for promotion and to informed to actualize their promotion within cadres. They shall have to stay and

not be allowed to go back immediately after promotion. Such stay shall, not less than a minimum of two years. If he/she declines his /her actual promotion will take place only when he/she returns to his /her parent cadre. His /her seniority in the higher post shall, however stand protected. **(Copy of the relevant pages of NWFP, Promotion policy 2009 is attached as "F").**

B) Incorrect, hence denied. The appellant has been treated as per law and rules.

C) Incorrect hence denied. Details have been submitted in the facts Above.

D) Incorrect hence denied. Details have been submitted above.

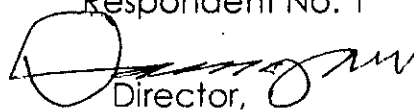
E) Incorrect hence denied. The appellant was on deputation as well as after expiry of her deputation period she willfully did not return her parent department on time, that's why she was demoted back to PST BPS-12.

F) Legal, However the respondents also seek permission for additional grounds during arguments.


It is, therefore, humbly prayed that on acceptance of the above submission, the instant Service Appeal may very graciously be dismissed in favor of the answering respondents with cost.



Secretary,
Elementary and secondary education
Peshawar Khyber Pakhtoon Khwa Peshawar
Respondent No. 1



Director,
Elementary and secondary education
Peshawar Khyber Pakhtoon Khwa Peshawar
Respondent No. 2



District Education Officer Female
District Chitral Upper
Respondent No.3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No. 7395/2021

Naseema Bibi D/O Noor Alam Khan, Currently posted at GGPS
Harchin, District Chitral Upper.. (Appellant)

Versus

4. Secretary, Elementary and secondary Education Khyber
Pakhtunkhwa Peshawar
5. Director, Elementary and secondary Education Khyber Pakhtunkhwa
Peshawar.
6. District Education Officer (F) Chitral Upper.

(Respondents)

Affidavit

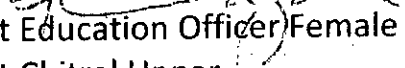
I, Muhammad Ikram Uddin , ADEO O/O THE DEO
(F) Chitral Upper **solemnly affirm and state on oath that the whole
contents of this reply are true and correct to the best of my knowledge
and belief and nothing has been concealed from this August court.**


Deponent
Muhammad Ikram Uddin

AUTHORITY LETTER

Mr. Muhammad Ikram Uddin, ADEO O/O the DEO (F) Chitral Upper is hereby authorized to submit the comments / reply in the Service Appeal No. 7395/2021.

Title: Naseema Bibi D/o Noor Alam Khan VS Govt etc on behalf of the undersigned.


District Education Officer)Female
District Chitral Upper
Respondent No.3



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) UPPER CHITRAL.
PHONE NO.0943470363
Email Address:deofchitralupper@gmail.com



"A" (7)

No. _____/inquiry-01

Dated the Chitral: _____/10/2022.

To,

The District Education Officer Male,
Upper Chitral.

Subject:

**REQUEST FOR AN INQUIRY OFFICER FOR PROMOTION/POSTING
OF MST: NASIMA BIBI GGPS HARCHINE**

Memo,

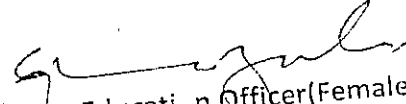
It is stated that this office requires the services of an impartial inquiry officer to conduct inquiry in to the promotion of Mst: Nasima Bibi from PST BPS -12 to PSHT BPS-15. In this connection you are requested kindly to nominate any of your officer for the purpose. It is further requested that the matter may kindly be taken as urgent and on priority basis, please.

District Education Officer(Female)
Upper Chitral

Dated the Chitral: 11/10/2022.

No. 3361/inquiry-01
Copy forwarded to the:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for his kind information.
2. Deputy Commissioner Upper Chitral.
3. District Monitoring Officer Upper Chitral.
4. Head Teacher GGPS Harchine.


District Education Officer(Female)
Upper Chitral

(11) "B" (8)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
No. SO(PE)5-2//IPT/ Chitral/Mst. Naseema Bibi PSHT/2014
Dated Peshawar the 21.07.2020

✓
The District Education Officer (Female),
Upper Chitral.

Subject: -

OFFICE ORDER AND APPLICATION IN RESPECT OF MRS. NASEEMA BIBI

Dear Madam,

I am directed to refer to the subject noted above and to enclose herewith a copy of an Office Order bearing No. F.1-9/168-EST (D) FDE dated 06.03.2020 alongwith her application and other necessary documents in respect of Mrs. Naseema Bibi, PSHT (BS-15), GGPS Harchina, District Chitral.

You are requested to adjust her in her home district Upper Chitral on repatriation from Federal Directorate of Education, Islamabad immediately. The salaries of the above said teacher may be adjusted as per last pay certificate.

Yours faithfully,


SECTION OFFICER (PRIMARY)

Encl: as above.

Copy for information to:

1. Director General, Federal Directorate of Education, Islamabad.
2. The Director E&SE Khyber Pakhtunkhwa, Peshawar, for similar necessary action.
3. The Admin Officer (HR-II F), FDE, Islamabad w/r to his/her letter quoted above.
4. Headmistress, Islamabad Model School for Girls (I-VIII), Bain Nala (F.A), Islamabad.
5. PS to Secretary, Elementary & Secondary Education Department, Peshawar.
6. The teacher concerned.


SECTION OFFICER (PRIMARY)



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

No. 748 / PESH/NASEM BIBI PSHT

Dated Peshawar the 2 / 4 / 2020

To

The District Education Officer,
(Female) Upper Chitral

Subject-

APPLICATION FOR TRANSFER IN R/O NASEEM BIBI PSHT TO
DISTRICT PESHAWAR

I am directed to refer to your letter no. 1780 dated 15-07-2020 the subject cited above in respect of Mst. Naseem Bibi PSHT District Upper Chitral and to ask you to adjust the teacher concerned in her original school in district Chitral & she may be asked to provide all the record pertaining to its extension in deputation period beyond 03 years.

[Signature]
Assistant Director Female
(E&SE) Khyber Pakhtunkhwa

Encls. No. 1

Copy of the above is forwarded to the
PA to Director E&SE/KPK Peshawar.

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa

ESB
copy to DDO (f)
copy to PA
PA
14/7/2020



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) UPPER CHITRAL.
PHONE NO.0943470363
Email Address:deofchitralupper@gmail.com



No. 8044 /EB(F)Ex-01

Dated the Chitral: 10 / 09 /2022.

To,

Ms:Nasima Bibi PST
GGPS Harchine.

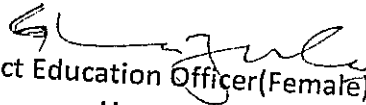
Subject:

**PROVISION OF RECORDS REGARDING EXTENSION IN
DEPUTATION PERIOD.**

Memo,

Reference Directorate of Elementary & Secondary Education Khyber
Pakhtunkhwa Peshawar No.2048/P.File Nasima-Bibi PST Dated Peshawar the 02.09.2020.


You are hereby directed to provide and submit to this office all the records
pertaining to your extension in deputation period in Federal Directorate beyond three years at
the earliest possible.



District Education Officer(Female)
Upper Chitral

No. 845-47 / EB(F)Exten-01
Copy forwarded to the:

Dated the Chitral: 10 / 09 /2022.

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar for his kind information.
2. District Monitoring Officer Upper Chitral.
3. Head Teacher GGPS Harchine.


District Education Officer(Female)
Upper Chitral


Female)
il



GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
 No. S.E.D. (P) / 2019 / 263-64 / 1 / 1000
 Dera Ismail Khan, 15/07/2019

The Admin Officer, Schools, Circle
 Federal Directorate of Education
 Government of Pakistan
 Islamabad

Subject: NO. FOR EXTENSION IN THE DEPUTATION PERIOD

Dear Sir,

I am pleased to inform you that the Government of Punjab has approved the extension of the deputation period of Mr. S. H. Hameed, District Chairman, Dera Ismail Khan, for the period from 15/07/2019 to 15/07/2020. The extension is granted for a period of 12 months. The extension is granted on the basis of the report submitted by the District Education Officer, Dera Ismail Khan, dated 15/07/2019. The extension is granted for the period from 15/07/2019 to 15/07/2020. The extension is granted for a period of 12 months. The extension is granted on the basis of the report submitted by the District Education Officer, Dera Ismail Khan, dated 15/07/2019.

SECTION OFFICER (PRIMARY)

End of even number & date:

Copy for information to:

1. The Director, Elementary & Secondary Education, Peshawar.
2. The District Education Officer, Haveli, Chahal.
3. PS to Secretary, E&SE, Department, Peshawar.

SECTION OFFICER (PRIMARY)

No. 263-64/1/1000
 Forwarded to

1. SDEO (F) Mastuj, Dist. 1
2. SDEO (F) Torikhan, Dist. 1

District Education Officer



ESTA CODE

**ESTABLISHMENT CODE KHYBER PAKHTUNKHWA
(REVISED EDITION) 2011**

**A COMPENDIUM OF LAWS, RULES AND INSTRUCTIONS
RELATING TO THE TERMS AND CONDITIONS
OF PROVINCIAL CIVIL SERVANTS**

**COMPILED BY;
(O&M) SECTION
ESTABLISHMENT & ADMINISTRATION DEPARTMENT**

اس فیصلے کا اطلاق نئی بھرتی اور مخصوص شدہ پوسٹوں پر ہوگا جس کی منظوری محکمہ خزانہ دے گا۔ اور اس مقدمہ کیلئے بہت مخصوص کرتے گا۔ مزید وضاحت کیلئے محکمہ خزانہ کا مراسلہ نمبر II-FD/Vol-11-22/94-95/B1/1-22/94-95/FD Vol-II مورخہ ۲۳ جولائی ۱۹۹۹ء ملاحظہ ہو۔ سال ۲۰۰۳ء میں محکمہ خزانہ نے پالیسی کی ایک بار پھر وضاحت کرتے ہوئے بذریعہ مراسلہ نمبر BI 70/2003-04/FD-1 مورخہ ۱۶ اپریل ۲۰۰۳ء تمام محکمہ جات کو یہ یاد دہانی کی کہ محکمہ جات میں مخصوص شدہ سکیلیں ایک کی باقاعدہ پیشین نالی ہونے پر قائم کردی جائیں اور محکمہ خزانہ سے ان کی فکسڈ تنخواہ پر تھیں کا معاملہ جواز کے ہمراہ اٹھایا جائے گا۔ ساتھ ہی ساتھ یہ وضاحت بھی کی گئی کہ مخصوص محکمہ جات میں سکیلیں ۱۶ اور ۱۷ کی تمام اسامیاں اور ریٹرنٹس محکموں میں سکیلیں ایک اور اوپر کی آسامیوں کو فکسڈ تنخواہ میں بدلنے کی ضرورت نہیں ہے۔ محکمہ خزانہ نے مراسلہ نمبر II-FD/Vol-11-22/2001-2002/B1/1-22/2001-2002/FD مورخہ ۳۱ مارچ ۲۰۰۵ء کے ذریعے وضاحت بھی کر دی ہے کہ مخصوص محکمہ جات میں مخصوص آسامیاں بھی باقاعدہ سرپلس ملازمین کی Adjustment تک فکسڈ تنخواہ میں تبدیل نہیں کی جائیں گی۔ نئی بھرتی اگر گزیر ہو تو سرپلس پول سے NOC لینا ضروری ہے۔ اگر سوبانی یا شعلی سرپلس پول میں مطلوبہ قابلیت کے حامل باقاعدہ ملازمین میسر نہ ہوں تو متعلقہ محکمہ سرپلس پول سے این او سی (NOC) حاصل کرنے کے بعد کنٹریکٹ کی بنیاد پر بھرتی محکمہ خزانہ کی کنٹریکٹ پالیسی جو کہ مراسلہ نمبر 12-1/2002 FD(SORSR-III) مورخہ ۱۲۶ اکتوبر ۲۰۰۲ء کے ذریعے جاری کی گئی کے تحت کریں گے۔

(ii) چونکہ سکیلیں - ایک ناچنگ تک بھرتی پر پابندی ہے لہذا وزیر اعلیٰ صوبہ سرحد سے بھرتی پر

پابندی میں نرمی کی منظوری بھی حاصل کی جائے گی۔

(iii) جہاں تک نئی بھرتی کے طریقہ کار کا تعلق ہے تو محکمہ نملہ نے (تعمیناتی، بتاریخہ بھرتی کروڑ 1989

میں ترمیم کر دی ہے جس کے مطابق محکمہ خزانہ سے منظوری اور ریٹرنٹس کے بعد سکیلیں ایک تا چار آسامیوں پر تعیناتی کیلئے نملہ چناؤ کمیٹی شعلی ایپلائمنٹ ایجنسی کے ذریعے تعیناتی عمل میں لائیگی۔ اور تین اضلاع میں ایپلائمنٹ ایجنسی موجود نہ ہوں وہاں پر شعلی سطح کی نملہ چناؤ کمیٹی معروف اخبارات میں تشہیر کے بعد تعیناتی عمل میں لائے گی۔ فکسڈ تنخواہ والے ملازمین کی تعیناتی کیلئے بھی یہی طریقہ کار اپنایا جائے گا۔

(iv) اگر مخصوص محکمہ جات میں سے کسی بھی محکمہ نے مخصوص شدہ پوسٹ کو فکسڈ تنخواہ والی پوسٹ میں تبدیل

کر دیا ہو تو بعد میں باقاعدہ سرپلس ملازم یا تنظیم عدالت بحال ہونے والے باقاعدہ ملازم کو اس پر ایڈجسٹ کرنے کیلئے ایسی آسامیوں کو Case to case بنیاد پر محکمہ خزانہ سے باقاعدہ پوسٹوں پر تبدیل کرایا جائے گا۔

(اقتاری: مراسلہ نمبر میٹھ سواط ۲ (ای ایچ اے ڈی) ۱-۱۰۵۱۰ مورخہ ۹ مئی ۲۰۰۲ء)

Promotion Policy

In order to consolidate the existing Promotion Policy, which is embodied in several circular letters issued in piecemeal from time to time, and to facilitate the line departments at every level in prompt processing of promotion cases of Provincial civil servants, it has been decided to issue the "North-West Frontier Province Civil Servants Promotion Policy, 2009" duly approved by the competent authority, for information and compliance by all concerned. This Policy will apply to promotions of all civil servants holding appointment on regular basis and will come into effect immediately. The Policy consists of the provisions given hereunder:-

I. Length of service.

(a) Minimum length of service for promotion to posts in various basic scales will be as under:

Basic Scale 18 :	5 years' service in BS-17
Basic Scale 19 :	12 years' service in BS-17 & above
Basic Scale 20 :	17 years' service in BS-17 & above

No proposal for promotion shall be entertained unless the condition of the prescribed length of service is fulfilled.

(b) Service in the lower pay scales for promotion to BP-18 shall be counted as follows:

- (i) Half of the service in BS-16 and one fourth in Basic Scales lower than 16, if any, shall be counted as service in Basic Scale 17.
- (ii) Where initial recruitment takes place in Basic Scale 18 and 19, the length of service prescribed for promotion to higher Basic Scales shall be reduced as indicated below:

Basic Scale 19 :	7 years' service in BS-18
Basic Scale 20 :	10 years' service in BS-18 and above. or 3 years' service in BS-19.

II. Linking of promotion with training:

(a) Successful completion of the following trainings is mandatory for promotions of officers of the Provincial Civil Service / Provincial Management Service to various Basic Scales:

- Mid-Career Management Course at National Institute of Management (NIM) for promotion to BS-19
- Senior Management Course at National Management College, Lahore for promotion to BS-20
- National Management Course at National Management College, Lahore for promotion to BS-21

(b) This condition will not be applicable to civil servants in specialized cadres such as Doctors, Teachers, Professors, Research Scientists and incumbents of purely

technical posts for promotion within their own line of specialization as envisaged in the existing Promotion Policy.

(c) The qualifying thresholds of quantification of PERs for nomination to these trainings are as under:

MCMC	60
SMC	70
NMC	75

(d) There will be no exemptions from mandatory trainings. An officer may, however, request for temporary exemption in a particular moment in time but grant of such exemption would be at the discretion of the competent authority. No such request with regard to an officer would be made by the Government Departments concerned.

(e) Three officers shall be nominated for each slot of promotion on the basis of their seniority. Those unwilling to attend will be dropped at their own expense without prejudice to the rights of others and without thwarting or minimizing the chance of improving the quality of service.

(f) Officers failing to undergo mandatory training in spite of two time nominations for a training shall stand superseded if such failure was not for the reasons beyond the control of the officers concerned.

III. Development of Comprehensive Efficiency Index (CEI) for promotion:

(a) The Comprehensive Efficiency Index to be maintained for the purpose of promotion is clarified as under:

(i) The minimum of aggregate marks for promotion to various grades shall be as follows:

Basic Scale	Aggregate marks of Efficiency Index
18	50
19	60
20	70
21	75

(ii) A panel of two senior most officers shall be placed before the Provincial Selection Board for each vacancy in respect of promotion to BS-18 & 19. Similarly, a panel of three senior most officers shall be submitted to the Provincial Selection Board for each position in respect of promotion to BS-20 and 21 and the officer with the requisite score on the Efficiency Index shall be recommended for promotion.

(iii) The senior most officer(s) on the panel securing the requisite threshold of the Efficiency Index shall be recommended by the Provincial Selection Board for promotion unless otherwise deferred. In case of failure to attain the requisite threshold, he (she)/they shall be superseded and the next officer on the panel shall be considered for promotion.

(i) The outstanding grading shall be awarded to officers showing exceptional performance but in no case should exceed 10% of the officers reported on. The grading is not to be printed in the PER form but the reporting officer while rating an officer as "outstanding" may draw another box in his own hand in the form, initial it and write outstanding on the descriptive side. Convincing justification for the award shall be recorded by the reporting /countersigning officer. The discretion of awarding "outstanding" is to be exercised extremely sparingly and the award must be merited.

(j) The quantification formula and instructions for working out quantified score are annexed.

IV. Promotion of officers who are on deputation, long leave, foreign training:

- a) The civil servants who are on long leave i.e. one year or more, whether within or outside Pakistan, may be considered for promotion on their return from leave after earning one calendar PER. Their seniority shall, however, remain intact.
- b) The civil servants who are on deputation abroad or working with international agencies within Pakistan or abroad, will be asked to return before their cases come up for consideration. If they fail to return, they will not be considered for promotion. They will be considered for promotion after earning one calendar PER and their seniority shall remain intact.
- c) ⁷⁸In case of projects partially or fully funded by the Federal or Provincial Government, where PERs are written by officers of Provincial Government, the condition of earning one calendar PER shall not be applicable. The officers on deputation to projects shall be considered for promotion. However, after promotion they will have to actualize their promotion within their cadre.
- d) The civil servants on deputation to Federal Government, Provincial Government, autonomous/semi-autonomous organization shall be considered for promotion and informed to actualize their promotion within their cadres. They shall have to stay and not be allowed to go back immediately after promotion. Such stay shall be not less than a minimum of two years. If he/she declines his/her actual promotion will take place only when he/she returns to his/her parent cadre. His/her seniority in the higher post shall, however, stand protected.
- e) The cases of promotion of civil servants who have not successfully completed the prescribed mandatory training (MCMC, SMC & NMC) or have not passed the departmental examination for reasons beyond control, shall be deferred.
- f) Promotion of officers still on probation after their promotion in their existing Basic Scales shall not be considered.
- g) A civil servant initially appointed to a post in a Government Department but retaining lien in a department shall not be considered for promotion in his parent department.

⁷⁸ para 1 (iv)(c) substituted vide circular letter No. SORIV/E&AD/1-16/2006, dated 19.4.2010

However, in case he returns to parent department, he would be considered for promotion only after he earns PER for one calendar year.

- h) A civil servant who has resigned shall not be considered for promotion no matter the resignation has yet to be accepted.

V. Deferment of Promotion:

- (a) Promotion of a civil servant will be deferred, in addition to reasons given in para-IV, if
- (i) His inter-se-seniority is disputed/sub-judice.
 - (ii) Disciplinary or departmental proceedings are pending against him.
 - (iii) The PER dossier is incomplete or any other document/ information required by the PSB/DPC for determining his suitability for promotion is not available for reasons beyond his control.
- (b) The civil servant whose promotion has been deferred will be considered for promotion as soon as the reasons for deferment cease to exist. The cases falling under any of the above three categories do not warrant proforma promotion but the civil servant will be considered for promotion after determining his correct seniority over the erstwhile juniors.
- (c) If an officer is otherwise eligible for promotion but has been inadvertently omitted from consideration in the original reference due to clerical error or plain negligence and is superseded, he should be considered for promotion as soon as the mistake is noticed.
- (d) If and when an officer, after his seniority has been correctly determined or after he has been exonerated of the charges or his PER dossier is complete, or his inadvertent omission for promotion comes to notice, is considered by the Provincial Selection Board/ Departmental Promotion Committee and is declared fit for promotion to the next higher basic scale, he shall be deemed to have been cleared for promotion alongwith the officers junior to him who were considered in the earlier meeting of the Provincial Selection Board/Departmental Promotion Committee. Such an officer, on his promotion will be allowed seniority in accordance with the proviso of sub-section (4) of Section 8 of the North-West Frontier Province Civil Servants Act, 1973, whereby officers selected for promotion to a higher post in one batch on their promotion to the higher post are allowed to retain their inter-se-seniority in the lower post. In case, however, the date of continuous appointment of two or more officers in the lower post/grade is the same and there is no specific rule whereby their inter-se-seniority in the lower grade can be determined, the officer older in age shall be treated senior.
- (e) If a civil servant is superseded he shall not be considered for promotion until he earns one PER for the ensuing one full year.
- (f) If a civil servant is recommended for promotion to the higher basic scale/post by the PSB/DPC and the recommendations are not approved by the competent authority

within a period of six months from such recommendations, they would lapse. The case of such civil servant would require placement before the PSB/DPC afresh.

VI. Date of Promotion:

Promotion will always be notified with immediate effect.

VII. Notional Promotion:

In respect of civil servants who retire (or expire) after recommendation of their promotion by the PSB/DPC, but before its approval by the competent authority, their promotion shall be deemed to have taken effect from the date of recommendation of the PSB/DPC, as the case may be, and their pension shall be calculated as per pay which they would have received had they not retired/expired.

VIII. Promotion of Civil Servants who are awarded minor penalties.

(a) The question of promotion to BS-18 and above in case of civil servants who have been awarded minor penalties has been settled by the adoption of quantification of PERs and CEI which allows consideration of such cases for promotion subject to deduction of 5 marks for each major penalty, 3 marks for each minor penalty and 1 mark for each adverse PER from the quantified score and recommendation for promotion on attaining the relevant qualifying threshold.

(b) However, the CEI policy is not applicable to civil servants in BS-16 and below. In this case, the concerned assessing authorities will take into consideration the entire service record with weightage to be given for recent reports and any minor penalty will not be a bar to promotion of such a civil servant.

IX. Promotion in case of pending investigations by NAB:

If there are any NAB investigations being conducted against an officer, the fact of such investigations needs to be placed before the relevant promotion fora which may take a considered decision on merits of the case.

2. All the existing instructions on the subject shall stand superseded to the above extent, with immediate effect.



آغا خان ہیلتھ سروس، پاکستان

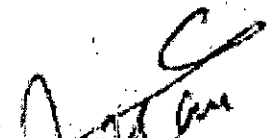
Aga Khan Health Service, Pakistan



To Whome it may concern.

It is certified that Mr Barlas
Gadim S/o Mr Qasim Khan,
resident of Laspur Harcham, Chitral
has completed his treatment under
my consultancy, w.e.f June, 15, 2021
to October 15, 2021.

Currently, he is able to continue
his studies after getting admission
in a college or university.

Dr.  Adil Khan,
Psychiatrist,
Aga Khan, Health, Services
Gilgit, Baluchistan & Chitral



Date: 30, December, 2021

Mob # 0314-9522892