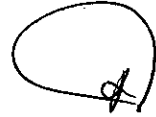


28.04.2023

Appellant present through counsel.

Muhammad Jan, learned District Attorney for respondents present.

Learned Member Executive (Mr. Muhammad Akbar Khan) is on leave, therefore, case is adjourned. To come up for arguments on 15.06.2023 before D.B. Parcha Peshi given to the parties.



(Rozina Rehman)
Member (J)


Mutazem Shah

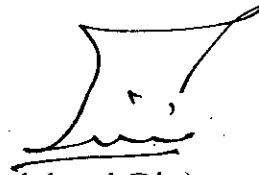
SCANNED
KPST
Peshawar

15.02.2023

Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for official respondents No. 1 to 3 present. None present on behalf of private respondent No. 4, hence she is placed ex-parte. Adjourned. To come up for arguments on 28.04.2023 before the D.B.

SCANNED
KUST
Peshawar


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

28.04.2023

Appellant present through counsel.

Muhammad Jan, learned District Attorney for respondents present.

Learned Member Executive (Mr. Muhammad Akbar Khan) is on leave, therefore, case is adjourned. To come up for arguments on before D.B. Parcha Peshi given to the parties.

(Rozina Rehman)
Member (J)

28th Nov. 2022

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. Advocate General for the official respondents and counsel for private respondent No. 4 present.

Learned counsel for private respondent No. 4 seeks adjournment in order to further prepare the brief. This being old case of 2019, last opportunity is granted to both the parties. To come up for arguments on 15.02.2023 before the D.B.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]


[Redacted]


21.06.2022

Learned counsel for the appellant present. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for official respondents present. Mr. Habib Ullah Mohmand, Advocate for private respondent No. 4 present.

Comments on behalf of official respondent No. 2 have already been submitted, while right of submission of reply/comments of official respondents No. 1 & 3 has been struck off.

Learned counsel for private respondent No. 4 stated at the bar that he rely on the comments already submitted by official respondent No. 2. Adjourned. To come up for arguments on 12.09.2022 before the D.B.



(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

12.09.2022

Learned counsel for the appellant present. Mr. Naseer-Ud-Din Shah, Assistant Advocate General for official respondents No. 1 to 3 present. Learned counsel for private respondents No. 4 present.

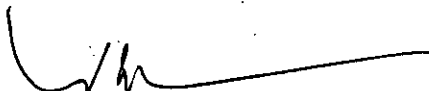
Mr. Mian Muhammad, learned Member (Executive) is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments before the D.B on 28.11.2022


(Salah-Ud-Din)
Member (J)

18.01.2022

Counsel for the appellant present. Mr. Muhammad Rasheed, DDA for official respondents present. Mr. Habibullah Mohmand, Advocate for private respondent No. 4 present and submitted Wakalatnama which is placed on file.

Learned counsel for the private respondent No. 4 sought adjournment. Learned counsel for the appellant has raised no objection on adjournment. Therefore, Case is adjourned to 18.03.2022 for arguments before the D.B.

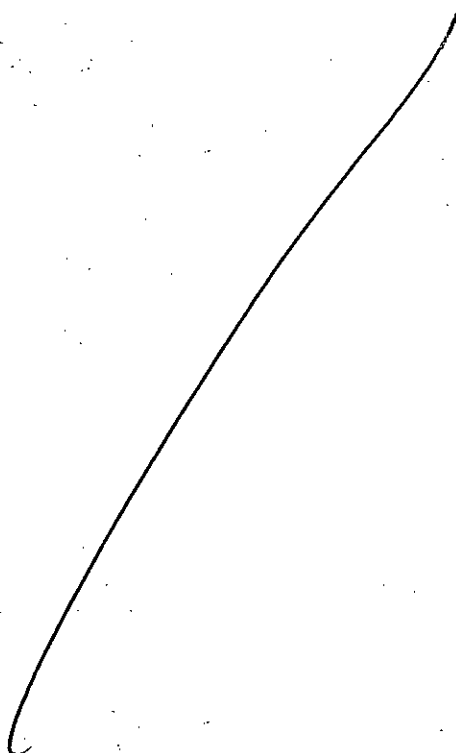

(Atiq-Ur-Rehman Wazir)
Member (E)


Chairman

18.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 21.06.2022 for the same as before.


Reader.




16.09.2021

Counsel for appellant present.

Asif Masood Ali Shah learned Deputy District Attorney for respondents No.1 to 3 present. None present on behalf of respondent No.4.

It appears from the order dated 15.09.2020 that comments were furnished on behalf of respondent No.2 while respondent No.1, 3 & 4 were given last opportunity. Learned D.D.A stated that respondent No.1 & 3 will be conducted for furnishing of comments on or before the next date. The notice was sent to the respondent No.4 twice, through Registered Post but it is not clear whether the same was received by her or not. The appellant is directed to furnish registered envelope alongwith acknowledgement for sending notice to the respondent No.4 for the next date. If comments on behalf of respondents No.1 & 3 are not available o file, their right shall be deemed as struck off. It has also been appointed out on behalf of appellant that she has been transferred from his present place of posting. The appellant shall also furnish the correct address. To come up on 18.01.2022 before D.B.


(Rozina Rehman)
Member (J)


Chairman

22.2.2021

Due to COVID-19, the matter is adjourned to 31.05.2021 for the same.

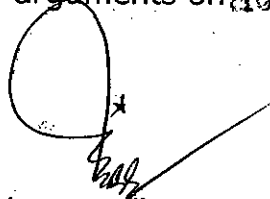

Reader

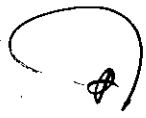
31.05.2021

Appellant present through counsel.

Riaz Khan Paindakheil learned Assistant Advocate General for respondents present

Former submitted rejoinder which is placed on file and made a request for adjournment; adjourned. To come up for arguments on ~~16.09~~ 16.09.2021 before D.B.


(Mian Muhammad)
Member (E)


(Rozina Rehman)
Member (J)

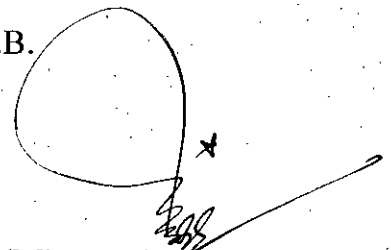
14.07.2020

Counsel for the appellant and Addl:AG for respondents present.

Learned counsel for the appellant has submitted an application for suspension of letter/order dated 14.02.2020 and restraining respondents from making recovery from the petitioner. Notice of this application be issued to the respondents for reply/arguments on the next date.

Written reply on behalf of respondents No. 1,3 and 4 not submitted. Notices be issued to respondents No. 1,3 and 4 for submission of written reply/comments by way of last chance.

Adjourned to 15.09.2020 before S.B.



(Mian Muhammad)
Member(E)

15.09.2020

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

Respondent No. 2 has already furnished parawise comments. Respondents No. 1, 3 and 4 have not furnished requisite reply/comments despite last opportunity. The matter is posted to D.B for arguments on 01.12.2020. The appellant may furnish rejoinder to the parawise comments of respondent No. 2, within a fortnight, if so advised.



Chairman

05.12.2020

Due to pandemic of Covid-19, the case is adjourned to 22.02.2021 for the same as before.



Reader

17.02.2020

Junior counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Javed, Litigation Officer for the respondents present. Written reply on behalf of respondents not submitted. Representative of the department seeks further time to furnish reply/comments. Adjourned to 11.03.2020 for written reply/comments before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

11.03.2020

Mr. Habibullah, husband of the appellant and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Javed, Litigation Officer on behalf of respondent No. 2 present. Representative of respondent No. 2 submitted written reply on behalf of respondent No. 2 which is placed on record. Neither written reply on behalf of respondents No. 1, 3 & 4 submitted nor their representatives are present, therefore, notices be issued to them with the direction to direct the representatives to attend the court and submit written reply on the next date positively. Last chance is given. To come up for written reply/comments on behalf of respondents No. 1, 3 & 4 on 20.04.2020 before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

20.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 14.07.2020 for the same. To come up for the same as before S.B.



Reader

14.11.2019

Counsel for the appellant present.

Contends that the appellant was promoted to the post of Senior Arabic Teacher (BPS-16) through notification dated 07.04.2014 while the respondent No. 4 attained the position of Senior Arabic Teacher through notification dated 24.02.2018. The seniority of appellant above the respondent No. 4 was also reflected in the list pertaining to Female SAT/AT of District Mohmand as on 31.12.2018. Despite, on 29.03.2019 the respondent No. 4 was promoted as SAT while the appellant was ignored for the purpose. In the said manner the impugned notification dated 29.03.2019 had resulted in jeopardizing the valuable rights of appellant, it was added.

In view of available record and arguments of learned counsel, instant appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 06.01.2020 before S.B.

Appellant Deposited
Security & Process Fee
27-11-19



Chairman

06.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Javed, Litigation Officer for the respondents present.

Representative of respondents requests for time to furnish reply/comments. Adjourned to 17.02.2020 on which date the requisite reply/comments shall positively be furnished.






Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 9313/2019

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	22/07/2019	<p>The appeal of Mst. Nuzhat Afshan submitted today by Mr. Fazal Shah Mohmand Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2		<p>This case is entrusted to SB for preliminary hearing to be put up there on <u>26-9-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	26.09.2019	<p>Mr. Wali Khan, Advocate on behalf of learned counsel for the appellant present.</p> <p>Request for adjournment is made as learned counsel is engaged today before the Apex Court at Islamabad. Adjourned to 14.11.2019 before S.B.</p> <p style="text-align: right;"> Chairman</p>

SCANNED
KPST
Peshawar

112

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 943 /2019

Nuzhat Afshan.....Appellant

V E R S U S

Director& Others.....Respondents

I N D E X

S.No	Description of documents	Annexure	Pages
1.	Service Appeal with Affidavit		1-3
2.	Copy of Notification dated 07-04-2014	A	4
3.	Copy of Notification dated 24-10-2018	B	5-6
4.	Copy of Seniority List dated 31-12-2018	C	7-8
5.	Copy of Notification dated 29-03-2019	D	9-11
6.	Copy of Departmental Appeal dated 15-04-2019	E	12
7.	Copy of Notification dated 08-08-2016	F	13-18
8.	Wakalat Nama		19

Dated:-19-07-2019

نزهت افشار
Appellant

Through


Faza! Shah Mohmand

Advocate, Peshawar

OFFICE:-Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841

Email:- fazalshahmohmand@gmail.com

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Diary No. 1026

Service Appeal No 943 /2019

Dated 22/7/19

Nuzhat Afshan Senior Arabic Teacher (BPS-16) Govt. Girls Middle School
Zarif Kore District Mohmand.....**Appellant**

V E R S U S

1. Director, Elementary and Secondary Education, Govt. of KPK Peshawar.
2. District Education Officer (Female) Mohmand.
3. Secretary, Elementary and Secondary Education, Govt. of KPK Peshawar.
4. Nazia Saeed Secondary School Teacher (General) Govt. Girls Middle School Baz Muhammad Kore District Mohmand.

.....**Respondents**

**APPEAL APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974
AGAINST THE PROMOTION ORDER/NOTIFICATION DATED 29-03-
2019 WHEREBY RESPONDENT NO 4 HAS BEEN PROMOTED AS SST
(GENERAL-BPS-16)AND AGAINST WHICH DEPARTMENTAL
APPEAL OF THE APPELLANT DATED 15-04-2019 HAS NOT BEEN
RESPONDED DESPITE THE LAPSE OF MORE THAN THE STATUTORY
PERIOD OF NINETY DAYS.**

PRAYER:-

On acceptance of this appeal, the impugned Order/Notification dated 29-03-2019 to the extent of respondent No 4 may kindly be set aside and the appellant may kindly be ordered to be promoted as Secondary School Teacher (General)(BPS-16) w.e.f 29-03-2019 with all back benefits.

Filed to-day
Registrar

Respectfully Submitted:-

1. That the appellant is highly qualified, has passed her Master Degree in Arabic with Bachelor of Education and was appointed as Arabic Teacher on 19-11-1994 and since then she performed his duties with honesty and full devotion and to the entire satisfaction of her high ups.
2. That the appellant being at the top of Seniority list of the cadre, was promoted/upgraded as Senior Arabic Teacher (BPS-16) vide

-2-

Notification dated 07-04-2014, which entry was also given effect in her Service Book. **(Copy of Notification dated 07-04-2014 is enclosed as Annexure A).**

3. That respondent No 4 was promoted as Senior Arabic Teacher (PBS-16) vide Notification date 24-10-2018 and her services were placed at the disposal of respondent No 2 for further posting. **(Copy of Notification dated 24-10-2018 is enclosed as Annexure B).**
4. That according to the Seniority List of the Female SAT/AT of District Mohmand issued on 31-12-2018, the appellant being the most senior is at the top of the same list. **(Copy of Seniority List dated 31-12-2019 is enclosed as Annexure C).**
5. That strangely respondent No 4 being Junior to the appellant was promoted as Secondary School Teacher (BPS-16) vide Notification dated 29-03-2019 ignoring the appellant. **(Copy of Notification dated 29-03-2019 is enclosed as Annexure D).**
6. That the appellant filed departmental appeal against the Notification dated 29-03-2019 on 15-04-2019 which has not been responded so far despite the lapse of more than the statutory period of ninety days. **(Copy of departmental appeal is enclosed as Annexure E).**
7. That the impugned Notification dated 29-03-2019 to the extent of promotion of respondent No 4 as Secondary School Teacher (BPS-16) is against the law, facts and principles of justice on grounds inter-alia as follows:-

GROUND:-

- A. That the impugned Notification dated 29-03-2019 to the extent of promotion of respondent No 4 illegal, unlawful without lawful authority and void ab initio.
- B. That mandatory provisions of law have been violated by the respondents and the appellant has not been treated according to law and rules and more particularly rules governing the subject.

- C. That the appellant is the most senior perfectly fit and eligible and coming up to the criteria set forth in law and rules but malafidely has not been promoted.
- D. That even as per the rules/law the appellant is entitled having more than the required length of service besides qualification for promotion as Secondary School Teacher (BPS-16). **(Copy of Notification dated 08-08-2016 is enclosed as Annexure F).**
- E. That there is no omission or commission on part of the appellant and she could not be punished for the fault of others if any.
- F. That the malafide of the respondents is proved from the impugned Notification wherein Junior has been promoted in utter violation of the criteria and universal principle governing Promotion i.e Seniority cum Fitness.
- G. That the appellant has about 25 years of service with unblemished service record.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for.

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

Dated:-19-07-2019

نزهت افشان
Appellant

Through


**Fazal Shah Mohmand
Advocate Peshawar.**

AFFIDAVIT

I, Nuzhat Afshan Senior Arabic Teacher (BPS-16) Govt. Girls Middle School Zarif Kore District Mohmand, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.



نزهت افشان
DEPONENT



AT

FATA SECRETARIAT
DIRECTORATE OF EDUCATION

KPK WARSAK ROAD PESHAWAR, PAKISTAN
PHONE 091-9210166 FAX 091-9210216

-A-

4-

Notification.

In pursuance of the Elementary & Secondary Education Department Khyber Pakhtunkhwa Notification No.(B&A)/1-18/E&SE 2012 dated 11.7.2012 and consequent upon recommendation of Departmental Promotion Committee, the following A.Ts B-15 (Female) in Mohmand Agency are hereby up-graded to the post of Senior A.Ts (B-16) Rs.(10000-800-34000) plus usual allowance as admissible under the rules on regular basis under the existing policy of Provincial Govt. in teaching cadre. They are placed at the disposal of AEO Mohmand Agency for further adjustment on the terms and conditions mentioned below with immediate effect.

S.No	Name of Teachers	Place of posting	Remarks
1	Nuzhat Afshah	GGMS.Zarif Kor.	Considered suitable for promotion of the post of Senior A.T BPS-16 on regular basis with immediate effect.

Terms and Conditions

1. They will be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations issued from time to time by the Government.
3. Their service can be terminated at any time. In case their performance is found unsatisfactory during probation period. In case of misconduct they will be preceded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their inter seniority on lower post will remain intact.
6. No TA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service Books to the effect that if any over payment has made to them in the light of this order will be recovered and if they are wrongly promoted they will be reserved.

(Muhammad Islam Bangash)
Director Education FATA

Endst:No. 3716-22

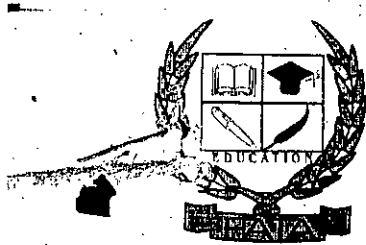
Dated Pesh:the 7/14/2014.

Copy forwarded to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa Peshawar.
3. District/Agency Accounts Officer concerned.
4. Agency Education Officer Mohmand Agency.
5. Official concerned.
6. P.A to Director Education FATA.

Additional Director (Estab)
Directorate of Education FATA

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AT(F)

FATA SECRETARIAT
Directorate of EducationWarsak Road Peshawar, Pakistan
Phone: 091-9210166 Fax 091-9210216

No. _____/dated ____/____/2018

"B"

Notification:

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Govt: of Pakistan Finance Division (Regulation Wing) Notification No.1(32)R-1/2015-582/2016 dated 25.7.2016 Islamabad, SO (Edu) Notification No.FS/SO(Edu)/SSD/Up-Gradation/2882-94 dated 22.6.2016 and duly Endorsed by Directorate of Education FATA vide No.8233-60 dated 8.8.2016, the following AT (F) B-15 are hereby promoted to the post of Sr.AT (F) B-16 (Rs.18910-1520-64510) plus usual allowances as admissible under the rules on regular basis on terms and conditions given below with immediate effect and further they will be posted in the Govt: Higher Secondary / High Schools by the District Education Officer concerned against the upgraded Sr.AT BPS-16 posts.

Total No. of AT (F) Posts duly verified by the DAO	27
1/3 share of Senior AT Posts	9
Share of promotion 100%	9
Already promoted to B-16 Sr.AT	Nil
No of Senior AT Posts available for promotion	07
Recommended for promotion to Sr. AT	01

S.#	Sen: No.	Name	Name of school	Date of Birth	Date of Regular Apptt: against AT Post	Remarks
1	8	Nazia Said	GGMS Nari killi	1/1/1980	22/01/2001	Services placed at the disposal of DEO Mohmand for further posting.

Terms & Conditions:

1. They would be on probation for a period of one year, extendible for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Se-Seniority on the lower post will remain intact.
6. No TA/DA is allowed for joining him/her duty.
7. They will give an undertaking to be recorded in their Service Book to the effect that any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted, he will be reversed.

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-6-

(Hashim Khan)
Director Education
NMTD

Endst: No. 13626-35 /File No:1/Promotion Senior AT B-16 dated 24/10/2018

Copy for information and necessary action is forwarded to the:

1. Accountant General (PR) Sub Office, Peshawar.
2. District Education Officer, Mohmand.
3. District Accounts Officer, Mohmand.
4. PS to Additional Chief Secretary NMTD.
5. PS to Secretary SSD, NMTD.
6. PS to Secretary Finance.
7. PA Director Education, local Directorate.
8. Official concerned.
9. Master File.

11
may 24/10/18
Addl: Director (Estab)
Directorate of Education,
NMTD

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FINAL SENIORITY LIST OF (FEMALE) SAI/AT IN DISTRICT MOHMAND CLEARED ON 31/12/2018

S.#	File No	Personal No	Name	Father Name	Academic Qualification	Professional Qualification	Design	BPS	Date of Birth	Domcile	Date of Ist Appont	Date of taking charge against regular AT Post in this Agency	Name of school	Remarks
1		102488	Nuzhat Afshah	Muhammad Sharif	MA	B.Ed	AT	16	20/7/1972		19/11/1994	19/11/1994	GGMS Zarif Kore	
2		102320	Irshad Begum	Tahseen ullah	BA	Sanad yafta	AT	15	10/7/1971		09/11/1994	09/11/1994	GGMS Ghami kore	
3		102278	Sadal Sabir	Ghulam sabir	SSC	Sanad yafta	AT	15	23/8/1974		25/01/1995	25/01/1995	GGMS Baz Mohammad	
4		102666	Saima Begum	Sayyar Khan	BA	S.Alamia/B.Ed	AT	16	30/10/1978		04/01/2000	04/01/2000	GGHS Shah Alam Salai	
5		102272	Rainaz Begum	Sayyar khan	BA	S.Alamia/B.Ed	AT	16	6/9/1978		4/1/2000	4/1/2000	GGMS Ham kor	
6			Nagina anjum	Habib Ur rehman	BA	Sanad yafta	AT	15	23/5/1977		18/01/2000	18/01/2000	GGHS Eka Ghund	
7			Yasmin Begum	Siar Khan	BA	S.Alamia/B.Ed	AT	16	1/1/1980		22/01/2001	22/01/2001	GGMS Etam Kore	
8	✓	101794	Nazi Said	Said Rehman	BA	MA(Arabic)/B.Ed	SAT	16	25/2/1976		21/02/2001	21/02/2001	GGMS Nari Kalai	
9			Rifat Bibi	Fazli Khadi	BA	S.Alamia/B.Ed	SAT	16	4/3/1981		12/04/2001	12/04/2001	GGHS Ghallanai	Refused
10			Abida Naz	Khan Raziq	BA	B.Ed	AT	15	15/10/1974		01/03/2000	30/11/2001	GGHS Subhan khwar	
11		112696	Naila Begum	Saeed ur Rahman	BA	Arabic Honrs	AT	15	1/8/1977		19/02/2001	30/11/2001	GGHS Sra shah	
12			Zaheen	Bakhtyar Ali	BA	MA(Islamayati)	AT	15	2/15/1982		01/09/2003	01/09/2003	GGMS Jalat kore	
13		102674	Basmina Bibi	Jan Wali	BA	S.Alamia	AT	15	10/1/1980		09/09/2003	09/09/2003	GGMS Navi kalai	
14		102675	Nadia Bakhtayar	Bakht yar Ali	BA	S.Alamia/B.Ed	AT	15	5/11/1978		09/09/2003	09/09/2003	GGMS Wazir Kalai	
15		355278	Wahida Begum	Gul Ahmad	FA	Sanad yafta	AT	15	2/2/1981		22/11/2005	22/11/2005	GGMS Faiz Muhammad	
16		323556	Maida Gul	Matiullah	BA	B.Ed	AT	15	12/11/1978		06/12/2005	06/12/2005	GGHS Sra shah	
17			Shazia Bibi	Raheem Dad	SSC	S.Alamia	AT	16	7/5/1984		17/11/2009	17/11/2009	GGMS Dawat kor	
18		157172	Nizakat	Abdur Rahman	FA	Arabic Honrs	AT	15	2/2/1975		01/11/1994	01/10/2011	GGHS Mian Mandi	

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7-11-18

File No.	Personal No	Name	Father Name	Academic Qualification	Professional Qualification	Desig:	BPS	Date of Birth	Domicile	Date of 1st Appott:	Date of taking charge against regular AT Post in this Agency	Name of school	Remarks
19	50288064	Shahnaz Begum	Hamid Gul	BA	S.Alamia	AT	15	11/3/1982		16/1/2016	16/1/2015	GGMS Dag Mula	
20		Saira Haider	Mian Haidar shah	BA	Alamia	AT	15	8/5/1984		16/1/2016	16/1/2016	GGHS Ato khei	

8
 Faiz Gulah
 Distt: Education Officer
 Distt: Mohmand
 Chiarmen,

Fazli Dayan
 Asstt: Distt: Education Officer
 Distt: Mohmand
 Member,

Saif Ullah
 Asstt: Distt: Education Officer
 Distt: Mohmand
 Member

Mst: Nimat Begum
 Asstt: Distt: Education Officer (F)
 Distt: Mohmand
 Member

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

 PHONE: 091-9210309, 9210330
9210427, 9210427, 9210444
FAX: 091-9210934

NO. _____ / DATED _____

Notification

In pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014 and recommendations of the Departmental Promotion Committee, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs of **District Mohmand**, are hereby promoted to the post of **SST (Bio-Chem), SST (Phy-Maths), SST (General)** and posted in the schools noted against each in **BPS-16 (Rs. 18910-1520-64510)** plus usual allowances as admissible under the rules on regular basis under the existing policy, on the terms and condition given below, with immediate effect in the interest of public service.

PROMOTION OF SPST/PSHT/PST TO SST (General) BPS-16 ON REGULAR BASIS.

Total No of SST SST(F) vacant posts	16
25% Share of Initial Recruitment	4
75 % Share of promotion	12
20% share of promotion of PSHT/SPST/PST	3
Already promoted to SST	1
Post Available for Promotion	2
Promoted through this order	2
	2

S.No	Sl. No.	Name of Official	Place of posting	D/O Birth	Date of Appott; regular PST	Qualification	Posted at	Remarks
1	10	Rifat Begum	GGPS Elam Kor	3-4-1970	14-5-1985	BA/BEed	GGHS Elim Kor	AVP
2	26	Shakila	GGPS Haleem Sher	1-4-1970	13-12-1989	BA//B.Ed	GGMS Baz Mohd	AVP

PROMOTION OF Sr; CT/CT TO SST (General) BPS-16 ON REGULAR BASIS

Total No of SST General Female vacant posts	16
25% Share of Initial Recruitment	4
75 % Share of promotion	12
40 % share of promotion of Sr CT/CT	6
No of SST already promoted	3
Post Available for Promotion	3
Promoted through this order	3

S.No	S.L No	Name of Official	Place of Posting	Date of Birth	Date of Appott; as Regular CT	Qualification	Posted at	Remarks
3	1	Shahida Begum	GGHS Dab Kore	21-5-1967	29-4-1992	BA/BEed	GGMS Wazir Killi	AVP
4	2	Naheed Salam	GGMS Baz Muhammad	17/4/1968	8/11/1994	BA/BEed	GGMS Jalal Kor	AVP

5	3	Fozia Shaheen	GGHS Dab Kor	31/12/1963	21/11/1994	BA/BEed	GGHS Navi Killi	AVP
---	---	---------------	--------------	------------	------------	---------	-----------------	-----

PROMOTION OF Sr; AT/SAT TO SST (General) BPS-16 ON REGULAR BASIS.

Total No of SST General Female vacant posts	16
25% Share of Initial Recruitment	4
75 % Share of promotion	12
4 % share of promotion of Sr AT/AT	1
No of Already SST Promoted	0
Post Avialable for Promotion	1
Promoted through this order	1

S. No	S. L No	Name of Official	Place of Postin g	Date of Birth	Date of Appott: as Regular SAT	Qualifi cation	Posted at	Remarks
6	8	Nazia Saeed	GGMS Nari Kali	25/02/1976	21/2/2001	BA/BEed	GGMS Baz Mohd Kor	AVP

PROMOTION OF Sr; TT/TT TO SST (General) BPS-16 ON REGULAR BASIS

Total No of SST General Female vacant posts	16
25% Share of Initial Recruitment	4
75 % Share of promotion	12
40 % share of promotion of Sr TT/STT	1
Already Promoted to SST	0
Post Avialable for Promotion	1
Promoted through this order	1

S. No	S. L No	Name of Official	Place of Posting	Date of Birth	Date of Appott: as Regular STT	Qualifica tion	Posted at	Remar ks
7	35	Jameela Begum	GGHS Ekkaghund	20/6/1975	11/02/1994	MA/ B.Ed	GGMS Hamid Khan Killi	AVP

Terms and conditions:-.

- 1 They would be on probation for a period of one year extendable for a further period of one year.
- 2 They will be governed by such rules and regulations as and when issued from time to time by
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 No TA/DA is allowed for joining his duty.
- 6 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him/her in the light of this order will be recovered and if he/she is wrongly promoted, he/She will be reverted.
- 7 Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
- 8 The prescribed qualifications/ documents may be verified from the concerned Universities/ Institutions by the AEO concerned.

ATTESTED
To Be True Copy

-11-
(Hafiz Muhammad Ibrahim)

Director

Elementary & Secondary Education
Khyber Pakhtunkhwa

Endst: No.

5301-20
/

Dated Peshawar the 28/11/2019

Copy forwarded for information and necessary action to the: -

1. Accountant General (PR) Sub Office, Peshawar.
2. Additional Accountant General (PR) Sub Office, Peshawar.
3. Accountant General Khyber Pakhtunkhwa Peshawar.
4. District Education Officer Mohmand at Ghallani.
5. District Accounts Officer Mohmand at Ghallani.
6. PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
8. Principal/Head Mistress concerned.
9. Promotees Concerned.
10. M/File.

Deputy Director (Estab:)
Merged District Khyber Pakhtunkhwa

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خدمت حساب ڈائریکٹر انجنیئرنگی و سکنڈری ایجوکیشن سندھ ایجوکیشن
عنوان - حق تلفی ثابت پروموشن

حساب عالی

ڈائریکشن ہے کہ سائلڈ نڈیت امتثال بحیثیت SAI گورنمنٹ
ٹرنز فڈل سکول طرف کو روٹہ ضلع لیکنہ خدمات مراعات دے رہی ہے

حالیہ پروموشن آدرس میں نازیدہ سعید گورنمنٹ ٹرنز فڈل
سکول نری علی ضلع لیکنہ جسکی تقریبی 21/2/2004 کو ہوئی تھی اور جو سے
جو سٹیج کی پروموشن آڈی کی ڈوسٹ پر آ رہی ہے

حساب عالی اعلیٰ سائلڈ کی تقریبی 17/11/1994 کو ہوئی سائلڈ
کو پروموشن سے محروم رکھا گیا ہے چونکہ سراسر نا انصافی ہے
میریابی کے اس باب کی تحقیقات کی جائے کہ سائلڈ کو
پروموشن کے حق سے کیوں محروم رکھا گیا ہے اور اسکا ازالہ کیا جائے

السلامتی

ایلی ٹاچہ

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To Be True Copy

سائلڈ نڈیت امتثال
SAI گورنمنٹ ٹرنز فڈل سکول
طرف کو روٹہ ضلع لیکنہ

المعوم
15/4
2019

0312-0915277
0333-9361280



FATA SECRETARIAT
(SOCIAL SECTORS DEPARTMENT)
WARSAK ROAD PESHAWAR
Dated Peshawar-22-06-2016

NOTIFICATION:-
No.FS/SO(Edu)/SSD/Up-gradation/ 2882-94 .In the light of Presidential Order No,13 of 1972 and in pursuance of
Elementary & Secondary Education Department, Khyber Pakhtunkhwa's Notification No.SO (B&A)/1-18/E&SE/2012 dated
Peshawar, 11.07.2012 the competent authority has been pleased to accord sanction for the up-gradation of the posts of
different Categories/Cadres of Teachers working in FATA, as an incentive for Higher Pay Scales, with effect from 01-07-
2012 as per details given below:-

S.No	Nomenclature of Teaching Cadre Post	Name of Institution with the name of Agency/FR	Existing Basic Pay Scale	New approved/Upgraded Basic Pay Scale	Remarks	
1.	1.	2.	3.	4.	5.	6.
1.	Primary School Teacher (PST)	Govt. Primary Schools (Agency/FR wise breakup attached)	BS-5 BS-6 BS-7 BS-9 BS-10 BS-12	(BS-12)	The post of PST is upgraded to BPS-12. Accordingly, 9510 posts of PSTs, already sanctioned in various pay scales are upgraded to BPS-12 for the present incumbents as well as future appointees.	
2	Senior Primary School Teacher (Sr. PST)	-do-	Newly Upgraded/ Re-designated post	(BS-14)	500 posts out of existing PSTs (9510) are upgraded to BPS-14 and re-designated as Senior PST. The posts will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any for the post	
3.	Primary School Head Teacher (PSHT)	-do-	Newly Upgraded/ Re-designated post	(BS-15)	4505 posts out of (9010) PST posts, (one post in each Primary School) are upgraded to BPS-15 and re-designated as Primary School Head Teacher, and will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any for the post.	

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	Certified Teachers (CT)	Govt. Middle/High/Higher Secondary School (Agency/FR wise breakup attached)	BS-9 BS-10 BS-12 BS-14 BS-15	(BS-15)	All the existing posts of CTs (2956) are upgraded in BPS-15 for the present incumbents as well as future appointees.
5.	Senior Certified Teachers (Sr. CT)	-do-	Newly Upgraded/ Re-designated post	(BS-16)	One thirds (1/3) of the total CTs (985) posts are upgraded to BPS-16 and re-designated as Senior CTs, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any for the post.
6.	Arabic Teachers (A.T)	-do-	BS-9 BS-10 BS-12 BS-14 BS-15	(BS-15)	All the existing posts of ATs (882) are upgraded in BPS-15 for the present incumbents as well as future appointees.
7.	Senior Arabic Teacher (Sr. AT)	-do-	Newly Upgraded/ Re-designated post	(BS-16)	One thirds (1/3) of the total ATs (294) posts are upgraded to BPS-16 and re-designated as Senior ATs, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any for the post.
8.	Teacher of Theology (T.T)	Govt. Primary/ Middle/High/Higher Secondary School (Agency/FR wise breakup attached)	BS-7 BS-9 BS-10 BS-12 BS-14 BS-15	(BS-15)	All the existing posts of TTs (3406) are upgraded in BPS-15 for the present incumbents as well as future appointees.

4-1-14

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9.	Senior Teacher of Theology (Sr. TT)	-do-	Newly Upgraded/ Re-designated post	(BS-16)	One thirds (1/3) of the total TTs (4135) posts are upgraded to BPS-16 and re-designated as Senior TTs, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any for the post.
10.	Drawing Masters (DM)	Govt. Middle/High/Higher Secondary School (Agency/FR wise breakup attached)	BS-9 BS-10 BS-12 BS-14 BS-15	(BS-15)	All the existing posts of DMs (918) are upgraded in BPS-15 for the present incumbents as well as future appointees.
11.	Senior Drawing Masters (Sr. DM)	-do-	Newly Upgraded/ Re-designated post	(BS-16)	One thirds (1/3) of the total DMs (306) posts are upgraded to BPS-16 and re-designated as Senior DMs, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any for the post.
12.	Physical Education Teachers (PET's)	-do-	BS-9 BS-10 BS-12 BS-14 BS-15	(BS-15)	All the existing posts of PETs (820) are upgraded in BPS-15 for the present incumbents as well as future appointees.

4-11-11

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3.	Senior Physical Education Teachers (Sr. PET's)	-do-	Newly Upgraded/ Re-designated post	(BS-16)	One thirds (1/3) of the total PETs (273) posts are upgraded to BS-16 and re-designated as Senior PETs which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any for the post.
14.	Qari/Qaria	-do-	BS-7	(BS-12)	All the existing posts of Qari/Qaria (318) are upgraded in BPS-12 for the present incumbents as well as future appointees.
			BS-9		
			BS-10		
			BS-12		
			BS-14		
			BS-15		
15.	Sr. Qari/Sr. Qaria	-do-	Newly Upgraded/ Re-designated post	(BS-15)	One thirds (1/3) of the total Qaris / Qarias (106) posts are upgraded to BPS-15 and re-designated as Senior Qaris / Qaria, which will be filled in the manner as may be prescribed by the Elementary & Secondary Education Department by making necessary service rules or amending the existing service rules, if any for the post.

2- It may please be ensured that the teachers, who have already availed the benefits of new upgraded scales referred to above, before the formal issuance of this Notification, are not allowed again the benefit of pay fixation in the new pay scales otherwise the onus for the irregular pay will rest with the departmental officers and Accounts Officers concerned.

3- A policy shall also be devised in the frame work of input / output criteria in terms of qualification, length of service, regularity, punctuality, results, curricular and co-curricular achievements and other performance indicators, so that the teachers do not take the scheme for granted but work for it.

4- Agency / FR wise / School wise breakup of the posts is enclosed here with as annexure.

Authority. Approval of Finance Division, Government of Pakistan, Islamabad as conveyed vide letter No.F.No.1(32)R-1/2015-251/2016 30th May 2016 (copy enclosed).

SECRETARY SOCIAL SECTORS (FAT/)

ATTESTED
To Be True Copy

Even No. & Date

DFA-17

Copy to:-

1. Secretary Finance Department, FATA Secretariat.
2. Secretary A.I&C Department FATA Secretariat.
3. Secretary (E & SE) Khyber Pakhtunkhwa Peshawar
4. Additional Accountant General (PR) Sub Office Peshawar
5. Director Education (FATA)
6. Director (E & SE) Khyber Pakhtunkhwa Peshawar
7. All Agency Education Officers in Agencies/FRs
8. All Heads of concerned Schools
9. All Agency Accounts Officers in FATA
10. District Accounts Officers, Kohat, Lakki, Bannu, D.I.Khan & Tank
11. SO (TA) SAFRON Division Islamabad with reference his office letter No.3(10) TA/2015 dated 13/5/2016
12. PS to Additional Chief Secretary FATA Secretariat
13. PS to Secretary Social Sector Department FATA Secretariat

(Abdul Manan)
Section Officer (Education)
Social Sector Department

Government of Pakistan
Finance Division
(Regulation Wing)

No 1(32)R-1/2015-552/2016

Islamabad, 28 July, 2016

Copy to:-

1. Accountant General (PR) Islamabad.
2. Additional Accountant General (PR) Sub Office Peshawar.
3. Director Education (FATA).
4. All Agency Education Officers in Agencies/FRs.
5. All Agency Accounts Officers in FATA.
6. District Accounts Officers, Kohat, Lakki, Bannu, D.I.Khan & Tank.
7. PS to Secretary Finance Department, FATA Secretariat.

(Zia-ur-Rehman)
Section Officer (R-1)

DIRECTORATE OF EDUCATION FATA SECRETARIAT PESHAWAR

Endst.No. 8733-60 / Dated 8/8 2016.

Copy forwarded for information and necessary action;

1. Accountant General (PR) Islamabad.
2. Additional Accountant General (PR) Sub Office Peshawar.
3. Director Elementary & secondary Education Khyber Pakhtunkhwa Peshawar.
4. All Agency Education Officers in Agencies/FRs FATA.
5. All Heads of concerned schools in FATA.
6. All Agency Accounts Officer in FATA.
7. District Accounts Officer, Kohat, Lakki, Bannu, D.I.Khan & Tank.
8. SO (TA) SAFRON Division Islamabad with reference to letter No.3 (10) TA/2015 dated 13/5/2016.
9. Section Officer(R-1) Finance Division (Regulation Wing) Islamabad w/r to letter No.1 (32) R-1/2015-382/2016 Islamabad dated 28/7/2016.
10. Section Officer (Edu) FATA Secretariat w/r to letter of Even No. & Date.
11. PS to additional Chief Secretary FATA.
12. PS to Secretary Finance Department FATA Secretariat.
13. PS to Secretary AI&C FATA Secretariat.
14. P.S to secretary Social Sectors Department FATA Secretariat.

Deputy Director (Establishment)
Directorate of Education (FATA)

ATTESTED
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Original Passed on to JS (R&TA) for immediate action
Government of Pakistan
Finance Division
(Regulations Wing)
-18-

Handwritten signature

SECRETARY F.No.1(32)R-I/2015-251/2016
MAY 2016

Islamabad, the 30th May, 2016

OFFICE MEMORANDUM

3. (R&TA)

Subject:- GRANT OF INCENTIVE OF HIGHER PAY SCALE TO DIFFERENT CATEGORIES/CADRES OF TEACHERS IN EDUCATION DEPARTMENT, FATA W.E.F. 01-07-2012

The undersigned is directed to refer to M/o SAFRON's letter No.12(01) P/L/2015 dated 10-05-2016 regarding grant of incentive of higher pay scales to teaching staff of FATA Schools & Colleges and to convey approval of Prime Minister to the proposal contained in para-5 read with para-10 of the summary.

2. The sanction letter to this effect may be referred to this Division for endorsement by Regulations Wing.

The Secretary,
Ministry of SAFRON,
Government of Pakistan,
Islamabad

Handwritten signature
(Zia-ur-Rehman)
Section Officer (R-I)

31 MAY 2016
1932-1
By No...

Handwritten initials/signatures
DS (R&TA)
SR (TA)

PPH
Handwritten signature
07-06-16

ATTESTED
To Be True Copy

WAKALAT NAMA - 19 -

IN THE COURT OF Service Tribunal KPK Peshawar

Nuzhat Afshan

VERSUS

Director & others

Accused/
Petitioner/
Appellant/
Plaintiff.

Respondent/
Defendant/
Complainant

FIR No. Dated: Police Station:

Charge U/s.

KNOW ALL to whom these presents shall come that I the undersigned appoint:

Fazal Shah Mohmand Advocate Supreme Court of Pakistan,
(herein after called the advocate) to be the Advocate for the Appellant in the above mentioned case, to do all the following acts, deeds and things or any of them that is to say:

- 1) To act and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or execution or in any other stage of its progress until its final decision.
- 2) To sign, verify and present pleadings, appeals, cross - objections, petitions for execution, review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of said case in all its stages.
- 3) To withdraw or compromise in the said case or submit to arbitration any difference or dispute that shall arise touching or in any manner relating to the said case.
- 4) To receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said case.
- 5) To engage any other Legal practitioner authorizing him to exercise the power and authorities hereby conferred on the Advocate whenever he may think fit to do so.

AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the promises.

AND I hereby agree not to hold the Advocate or its substitute responsible for the result of the said case and in consequence of his absence from the court when the said case is called up for hearing

AND I hereby that in the event of the whole or any part of the fee agreed by me to be paid to the Advocate remaining unpaid, He shall be entitled to withdraw from the prosecution of the said case until the same is paid.

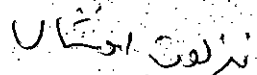
IN WITNESS WHEREOF I hereunto set my hand to these presents the contents of which have been explained to and understood by me, this _____ day of _____ 201__

Accepted By



Fazal Shah Mohmand
Advocate Supreme Court of Pakistan

Signature / thumb impression
of party / parties.



ATTESTED

To Be True Copy

BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 943/2019

NUZHAT AFSHAN Senior Arabic Teacher GMS ZARIF KOR, DISTT: MOHMAND

.....**PETITIONER**

VERSUS

1. DIRECTOR E & S EDUCATION, KHYBER PAKHTUNKHWA AND OTHERS

.....**Respondents**

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1	PARAWISE COMMENTS and affidavit	1-3
2	Copy of the withdrawal notification dated 16/9/2014	A	4
3	Copy of the seniority list 31/12/2018	B	5-6
4	(Copy of Notification 29/3/2019	C	7-9
5	(Copy of the Working paper	D	10

SERVICE APPEAL NO. 943/2019

①

NUZHAT AFSHAN Arabic Teacher GMS ZARIF KOR, DISTT: MOHMAND

.....**PETITIONER**

VERSUS

1. DIRECTOR E&S EDUCATION KHYBER PAKHTUNKHWA AND OTHERS

.....**Respondents**

Para-wise comments on behalf of respondent No: 1 & 2

Respectively Sheweth:

Preliminary Objection

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by her own conduct to bring the instant appeal

On Facts:

1. Correct.
2. Incorrect. Hence denied. The Notification dated 7/4/2014 through which the appellant promoted to SAT was withdrawn by the respondent department vide notification dated: 16/9/2014.

(Copy of the notification 16/9/2014 is attached as annexure A)

3. Correct. The respondent No.4 was duly promoted by the respondent No.1 vide Notification 29/3/2019 and since then is performing her duty as SST (BPS-16).
4. Correct. That although the appellant was on top of the list but she hold the post of Arabic Teacher (AT) while on the other hand the respondent No.4 hold the post of Senior Arabic Teacher (SAT). **(Copy of the seniority list 31/12/2018 is attached as B)**. So, the respondent No.4 was being the most eligible candidate for promotion to SST (BPS-16) and

thus duly promoted. **(Copy of Notification 29/3/2019 is attached as annexure C)**

2

5. Incorrect. Hence denied. The respondent No. 4 was among the most senior in Senior Arabic Teacher SAT (BPS-16) as evident from the seniority list on serial No.8. So, respondent No. 4 was the most eligible Candidate for promotion to SST and thus was duly promoted. **(see annexure B)**

Similarly, it is also pertinent to mentioned over here that in the recent departmental promotion committee meeting the appellant name is under consideration for promotion to Senior Arabic Teacher and if found eligible by the committee will be promoted to SAT. **(Copy of the Working paper is attached as annexure D)**

6. The appellant does not accrue any right for promotion to SST as currently she hold AT post and her name is under consideration for promotion to SAT. **See annexure D**
7. Incorrect. Hence denied. The notification of 29-03-2019 is in accordance with law as followed all the required codal formalities. Therefore, the promotion of respondent No. 4 vide the notification dated 29-03-2019 is in accordance with law.

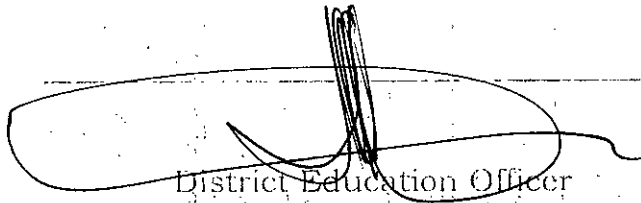
On Grounds

- A. Incorrect. Hence denied. The promotion of respondent No. 4 is in accordance with law.
- B. Incorrect. Hence denied. The detailed answer is elucidated in above para.
- C. Incorrect. Hence denied. As elucidated in para 4,5 and 6
- D. Incorrect. Hence denied. The appellant name is under consideration for promotion to SAT before the Departmental promotion committee. And if found eligible will be promoted to SAT and not to SST.
- E. Incorrect. Hence denied. See answer in the above para.
- F. Incorrect hence denied. The notification dated: 29-03-2019 of the respondents is in accordance with law. The answering department followed all the required codal formalities and while doing so the answering respondents did not violate any provision of law.
- G. Correct.

Pray:

In view of the above factual and legal position, it is humbly prayed that the appeal in hand be dismissed with cost.

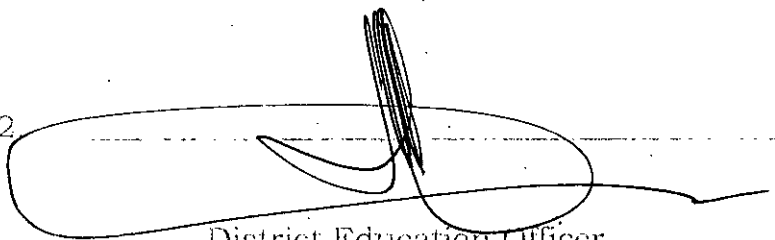
Respondent NO. 2.


District Education Officer
Mohmand

AFFIDAVIT

We the above respondents do hereby declare and affirm on oath that the above comments are true and correct to the best of our Knowledge and belief and that nothing has been concealed from this Honorable Tribunal.

Respondent NO. 2.


District Education Officer
Mohmand

4

A²



FATA SECRETARIAT (5)
 DIRECTORATE OF EDUCATION
 KPM WARSAK ROAD PESHAWAR, PAF 27100
 NO. _____
 DATED _____
 F-6 IIP GRAD FILE VOL 1.0

DIRECTORATE OF EDUCATION (FATA) SECRETARIAT PESHAWAR
TEACHING STAFF

Consequent upon the orders passed by the Competent Authority the up-gradation allowed to various teaching staff in FATA is hereby with drawn forthwith all further orders.

The amount drawn by the concerned teachers in up-graded pay scale should be recovered and to be deposited into Government treasury with producing a copy of challan there of to this Directorate.

(Roz Wali Khan Khattak)
 Director Education FATA,

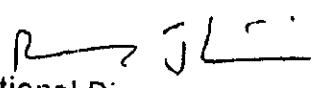
Endst.No. 10322-52

Dated 16/9 2014

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

- 1. PS to Additional Chief Secretary
- 2. PS to Secretary AI&C FATA
- 3. All the Agency Education Officers in FATA
- 4. Principals/Head Masters/Head Mistress concerned
- 5. Assistant Accountant General (PR) Sub Office Peshawar.
- 6. All AAOs/DAOs concerned
- 7. Deputy Directress Estab local Directorate.

} For strict and timely implementation.


 Roz Additional Director (Estab)

"B"

5

69

FINAL SENIORITY LIST OF (FEMALE) SAI/AT IN DISTRICT MOHMAND CLEARED ON 31/12/2018

S.#	File No.	Personal No.	Name	Father Name	Academic Qualification	Professional Qualification	Design	BPS	Date of Birth	Domicile	Date of 1st Appoint.	Date of taking charge against regular AT Post in this Agency	Name of school	Remarks
1		102488	Nuzhat Afshan	Muhammad Sharif	MA	B.Ed	AT	16	20/7/1972		19/11/1994	19/11/1994	GGMS Zarif Kore	
2		102320	Irsbad Begum	Tahseen ullah	BA	Sanad yafit	AT	15	10/7/1971		09/11/1994	09/11/1994	GGMS Ghami kore	
3		102278	Sadar Sabir	Ghulam sabir	SSC	Sanad yafit	AT	15	23/8/1974		25/01/1995	25/01/1995	GGMS Baz Mohammad	
4		102666	Saima Begum	Sayyar Khan	BA	S.Alamia/B.Ed	AT	16	30/10/1978		04/01/2000	04/01/2000	GGHS Shah Alam Salai	
5		102272	Rainaz Begum	Sayyar Khan	BA	S.Alamia/B.Ed	AT	16	6/9/1978		4/1/2000	4/1/2000	GGMS Ilam kor	
6			Nagina anjum	Habib Ur rehman	BA	Sanad yafit	AT	15	23/5/1977		18/01/2000	18/01/2000	GGHS Eka Ghund	
7			Yasmin Begum	Siar Khan	BA	S.Alamia/B.Ed	AT	16	1/1/1980		22/01/2001	22/01/2001	GGMS Eiam Kore	
8	✓	101791	Nazi Said	Said Rehman	BA	MA/Arabi/yr.Ed	SAT	16	25/2/1976		21/02/2001	21/02/2001	GGMS Nari Kalai	
9			Rifat Bibi	Fuzli Khadi	BA	S.Alamia/B.Ed	SAT	16	4/3/1981		12/04/2001	12/04/2001	GGHS Ghafana	Refused
10			Ahida Naz	Khan Raziq	BA	B.Ed	AT	15	15/10/1974		01/03/2000	30/11/2001	GGHS Subhan khwar	
11		112696	Naila Begum	Saeed ur.Rahman	BA	Arabic Honrs	AT	15	1/8/1977		19/02/2001	30/11/2001	GGHS Sra shah	
12			Zahreen	Bakhtyar Ali	BA	MA(Islamiyat)	AT	15	2/15/1982		01/09/2003	01/09/2003	GGMS Jalat kore	
13		102674	Basmina Bibi	Jan Wali	BA	S.Alamia	AT	15	10/1/1980		09/09/2003	09/09/2003	GGMS Navi kalai	
14		102675	Nadia Bakhtayar	Bakht yar Ali	BA	S.Alamia/B.Ed	AT	15	5/11/1978		09/09/2003	09/09/2003	GGMS Wazir Kalai	
15		355278	Wahida Begum	Gul Ahmad	FA	Sanad yafit	AT	15	2/2/1981		22/11/2005	22/11/2005	GGMS Faiz Muhammad	
16		323536	Maida Gul	Matiullah	BA	B.Ed	AT	15	12/11/1978		06/12/2005	06/12/2005	GGHS Sra shah	
17			Shazia Bibi	Raheem Dad	SSC	S.Alamia	AT	16	7/5/1984		17/11/2009	17/11/2009	GGMS Dawat kor	
		157172	Nizakat	Abdur Rahman	FA	Arabic Honrs	AT	15	2/2/1975		01/11/1994	01/10/2011	GGHS Mian Mandi	

7-11C

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42

File No.	Personal No	Name	Father Name	Academic Qualification	Professional Qualification	Desig:	BPS	Date of Birth	Domcile	Date of 1st Appnt:	Date of taking charge against regular AT Post in this Agency	Name of school	Remarks
19	50288064	Shahnaz Begum	Hamid Gul	BA	S.Alamia	AT	15	11/3/1982		16/1/2016	16/1/2015	GGMS Dag Mula	
20		Saira Haider	Mian Haider shah	BA	Alamia	AT	15	8/5/1984		16/1/2016	16/1/2016	GGHS Ato khe	

8-1

[Signature]
 Faizullah
 Asstt: Education Officer
 Distt: Mohmand
 Chairman,

Fazli Dayan
 Asstt: Distt: Education Officer
 Distt: Mohmand
 Member,

[Signature]
 Saif Ullah
 Asstt: Distt: Education Officer
 Distt: Mohmand
 Member

[Signature]
 Mst: Nimat Begum
 Asstt: Distt: Education Officer (F)
 Distt: Mohmand
 Member



Notification

In pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(PE)/4-5/SSRC/Meeting/2013/Teaching Cadre dated 24th July, 2014 and recommendations of the Departmental Promotion Committee, the following SCTs/CTs, SDMs/DMs, SATs/ATs, STTs/TTs, Senior Qaris/Qaris, PSHTs/SPSTs/PSTs of **District Mohmand**, are hereby promoted to the post of SST (Bio-Chem), SST (Phy-Maths), SST (General) and posted in the schools noted against each in BPS-16 (Rs. 18910-1520-64510) plus usual allowances as admissible under the rules on regular basis under the existing policy, on the terms and condition given below, with immediate effect in the interest of public service.

PROMOTION OF SPST/PSHT/PST TO SST (General) BPS-16 ON REGULAR BASIS.

Total No of SST SST(F) vacant posts	16
25% Share of Initial Recruitment	4
75 % Share of promotion	12
20% share of promotion of PSHT/SPST/PST	3
Already promoted to SST	1
Post Available for Promotion	2
Promoted through this order	2
	2

S.No	Sl. No.	Name of Official	Place of posting	D/O Birth	Date of Appott; regular PST	Qualification	Posted at	Remarks
1	10	Rifat Begum	GGPS Elam Kor	3-4-1970	14-5-1985	BA/BEed	GGHS Elim Kor	AVP
2	26	Shakila	GGPS Haleem Sher	1-4-1970	13-12-1989	BA//B.Ed	GGMS Baz Mohd	AVP

PROMOTION OF Sr: CT/CT TO SST (General) BPS-16 ON REGULAR BASIS

Total No of SST General Female vacant posts	16
25% Share of Initial Recruitment	4
75 % Share of promotion	12
40 % share of promotion of Sr CT/CT	6
No of SST already promoted	3
Post Available for Promotion	3
Promoted through this order	3

S.No	S.L No	Name of Official	Place of Posting	Date of Birth	Date of Appott; as Regular CT	Qualification	Posted at	Remarks
3	1	Shahida Begum	GGHS Dab Kore	21-5-1967	29-4-1992	BA/BEed	GGMS Wazir Killi	AVP
4	2	Naheed Salam	GGMS Baz Muhammad	17/4/1968	8/11/1994	BA/BEed	GGMS Jalal Kor	AVP

(8)

3	Fozia Shaheen	GGHS Dab Kor	31/12/1963	21/11/1994	BA/BEEd	GGHS Navi Killi	AVP
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PROMOTION OF Sr: AT/SAT TO SST (General) BPS-16 ON REGULAR BASIS.

Total No of SST General Female vacant posts	16
25% Share of Initial Recruitment	4
75 % Share of promotion	12
4 % share of promotion of Sr AT/AT	1
No of Already SST Promoted	0
Post Available for Promotion	1
Promoted through this order	1

S. No	S. L No	Name of Official	Place of Posting	Date of Birth	Date of Appott: as Regular SAT	Qualification	Posted at	Remarks
6	8	Nazia Saeed	GGMS Nari Kali	25/02/1976	21/2/2001	BA/BEEd	GGMS Baz Mohd Kor	AVP

PROMOTION OF Sr: TT/TT TO SST (General) BPS-16 ON REGULAR BASIS

Total No of SST General Female vacant posts	16
25% Share of Initial Recruitment	4
75 % Share of promotion	12
40 % share of promotion of Sr TT/STT	1
Already Promoted to SST	0
Post Available for Promotion	1
Promoted through this order	1

[Signature]
28/02/14

S. No	S. L No	Name of Official	Place of Posting	Date of Birth	Date of Appott: as Regular STT	Qualification	Posted at	Remarks
7	35	Jameela Begum	GGHS Ekkaghund	20/6/1975	11/02/1994	MA/ B.Ed	GGMS Hamid Khan Killi	AVP

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for a further period of one year.
- 2 They will be governed by such rules and regulations as and when issued from time to time by .
- 3 Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 No TA/DA is allowed for joining his duty.
- 6 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him/her in the light of this order will be recovered and if he/she is wrongly promoted, he/She will be reverted.
- 7 Before handing over charge once again their document may be checked if they have not the prescribed qualifications as per rules, they may not be handed over charge of the post.
- 8 The prescribed qualifications/ documents may be verified from the concerned Universities/ Institutions by the AEO concerned.

(9)

(Hafiz Muhammad Ibrahim)
Director
Elementary & Secondary Education
Khyber Pakhtunkhwa

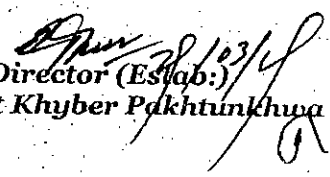
Endst: No.

5301-20
/

Dated Peshawar the 29/12/2019

Copy forwarded for information and necessary action to the: -

1. Accountant General (PR) Sub Office, Peshawar.
2. Additional Accountant General (PR) Sub Office, Peshawar.
3. Accountant General Khyber Pakhtunkhwa Peshawar.
4. District Education Officer Mohmand at Ghallani.
5. District Accounts Officer Mohmand at Ghallani.
6. PS to Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
7. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
8. Principal/Head Mistress concerned.
9. Promotees Concerned.
10. M/File.


Deputy Director (Estab.)
Merged District Khyber Pakhtunkhwa

OFFICE OF THE DISTRICT EDUCATION OFFICER DISTRICT MOHMAND

Revised

WORKING PAPERS FOR DEPARTMENTAL PROMOTION COMMITTEES FOR THE PROMOTION OF AT (FEMALE) B-15 TO B-16 IN R/O EDUCATION SECTOR DISTT. MOHMAND

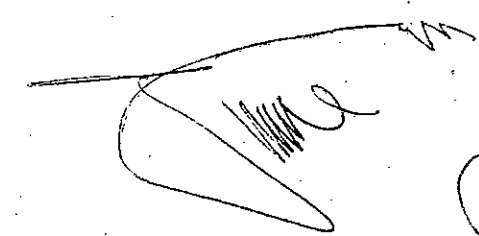

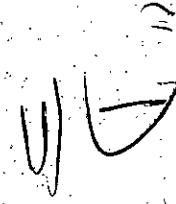
Total No of AT Sanctioned posts (duly verified by AEO).	27
1/3 share of Senior AT (F/M) psts	9
share of promotion 100%	100
Met to be promoted	7
Proposed for promotion.	3

S.#	S.L.#	File #	Personal No	Name	Father Name	Academic Qualification	Professional Qualification	Desig:	BPS	Date of Birth	Date of 1st Appont:	Date of taking over charge as regular AT	Name of school	Documents Available	whether eligible for Promotion	Remarks
														Yes/No	Yes/No	
1			102488	Nuzhat Afshan	Muhammad shafiq	MA	MA Arabic/B.Ed	AT	16	20/7/1972	19/11/1994	19/11/1994	GGMS Zarif kore		Recommended	
2			101845	Abida Naz	Khan Raziq	MA	MA Arabic/B.Ed	AT	16	13/10/1974	01/03/2000	01/03/2000	GGHS Subhan khawar		Recommended	
3	16			Shazia Bibi	Raheem Dad	FA	S.Alamia	AT	16	7/5/1984	17/11/2009	17/11/2009	GGMS Dawat kore		Recommended	

CERTIFICATE:-

1. It is certified that all the ATs (F/Male) included in the panel for promotion from B-15 to B-16.
 - (a) hold the posts on regular basis and none of them is holding the post on adhoc/acting charge basis/contract.
 - (b) have completed the required minimum length of qualifying service and qualifications as required for promotion of AT B-15 to Senior AT B-16 under the rules.
 - (c) None of them is on deputation to any organization under the federal/provincial/Autonomous/semi autonomous/international Organizations.
 - (d) Neither any disciplinary/departamental proceedings/Anti corruption/judicial enquiry is pending against them nor has any penalty been imposed upon any one of them during the last five years.
 - (e) No one is on long leave/Ex-Pakistan leave.
 - (f) Their ACRs synopsis are free from adverse remarks.
 - (g) They are all alive and serving.
 - (h) Their service books are enclosed herewith.
 - (i) The seniority list of Arabic Teachers is final, undisputed and not subjudice.
2. The departmental promotion committee is requested to determine the suitability of the above ATs for promotion from AT B-15 to Senior AT B-16.

District Education Officer,
Distt. Mohmand at Ghallanai


 Attested


 10

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR.

Service Appeal No 943/2019

Nuzhat Afshan.....Appellant.

V E R S U S

Director and Others.....Respondents.

**APPLICATION FOR FILING CORRECT ADDRESS OF
RESPONDENT NO 4.**

Respectfully Submitted:-

1. That the above titled Appeal is pending before this honorable Tribunal in which next date is fixed for 18.01.2022.
2. That on the last date of hearing the appellant was directed to file correct address of respondent No 4, which are as under:-

Correct address of Respondent No 4 (Mst. Nazia Saeed)

Presently posted as Assistant Sub Divisional Education Officer at office of the District Education Office (F) Khyber at Jamrud.

It is therefore prayed, that on acceptance of this application, the correct address of respondent No 4 may kindly be brought on record and notice be issued to her accordingly.

Dated:--21-10-2021

Appellant

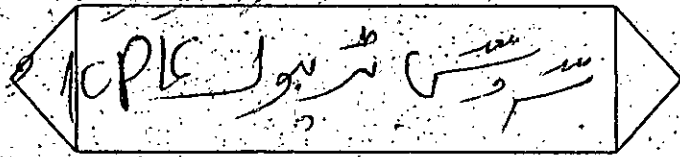
Through



Fazal Shah Mohmand

Advocate Supreme Court,

بعدالت خیر ہوگا



Nuzia Saeed

2 پنجاب

18th Jan 2022

Service appeal

Director
Prison

Nuzhat
Agha

Secretary
Prison

دعوی

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی وکل کاروائی متعلقہ
آن مقام اختیار کیے۔ امیر ایوب اللہ صاحب اور نازیا سید صاحبہ کی طرف سے درخواست کی گئی ہے کہ
مقررہ کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا کٹرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دبا کرانے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے
اور اس کا ساختہ پر داخہ منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائنہ التوائے مقدمہ کے
سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ البذاو کالت نامہ لکھد یا کہ سندر ہے۔

Accepted

Attested
By

Accepted

Attested
By

18 جنوری 2022

العبد العبد

CPK Service Tribunal کے لئے منظور ہے۔

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR.

Service Appeal No 943 /2019

Nuzhat Afshan.....Appellant

V E R S U S

Director and others.....Respondents

I N D E X

S.No.	Description of documents	Annexure	Pages
1.	Application for interim relief with affidavit		1-2
2.	Copy of Letter/Order dated 14-02-2020	A	3

Dated:-11-03-2020

Petitioner

Through

Fazal Shah Mohmand
Fazal Shah Mohmand

Advocate Supreme Court.

OFFICE:- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841

Email:- fazalshahmohmand@gmail.com

Put up to the court with relevant app-ey.

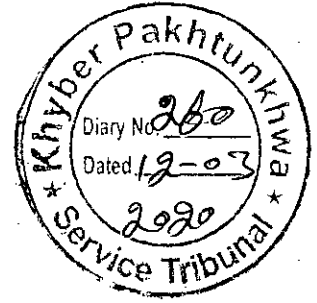
D. Sadev.

12/3/2020

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR.

Service Appeal No 943 /2019



Nuzhat Afshan.....**Appellant**

VERSUS

Director and others.....**Respondents**

Application for the suspension of Letter/Order dated 14-02-2020 and restraining respondents from making recovery from the petitioner till the final disposal of titled case.

Respectfully submitted:-

1. That the above titled Service Appeal is pending before this honorable Tribunal and is fixed for today, i,e 11-03-2020.
2. That the applicant/appellant was upgraded however as per letter dated 14-02-2020 has been withdrawn and petitioner has been directed to submit pay roll etc so that recovery may be made from her. **(Copy of Letter dated 14-02-20202 is enclosed as Annexure A).**
3. That the applicant has got a good prima facie case and is sanguine of its success.
4. That the balance of convenience lies in her favor and if the impugned order is not suspended and respondents are not restrained from making recovery from the petitioner, the applicant would suffer irreparable loss.

-2-

It is therefore prayed that on acceptance of this application, the impugned Letter/Order dated 14-02-2020, may kindly be suspended by restraining respondents from making recovery from the petitioner, till the final disposal of instant Service Appeal.

Dated:-11-03-2020

Nuzhat
Petitioner


Through
Fazal Shah
Fazal Shah Mohmand

Advocate Supreme Court..

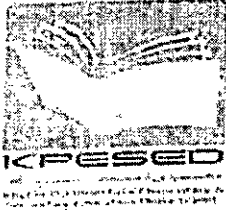
AFFIDAVIT

I, Nuzhat Afshan, Senior Arabic Teacher (BPS-16) Govt. Girls Middle School Zarif Kor District Mohmand, do hereby solemnly affirm and declare on oath that the contents of the this **Application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable Tribunal.

Nuzhat
DEPONENT

11-3-2020


-3- "A"



OFFICE OF THE DISTRICT EDUCATION OFFICER
MOHMAND TRIBAL DISTRICT

Ph. No. ☎: 0924-290180

FAX ☎: 0924290180

Email ✉: - deomohmand@gmail.com

NO. 856 / DATED 14 / 2 / 2020



To

Mst. Nuzhat Afshan TT
GGMS Zarif Kore
Tehsil Ekka Ghund

Subject: -

RECOVERY OF ILLEGAL DRAWL

Memo:

I am to refer to the captioned subject cited above and to state that your post had been upgraded to the post of senior TT vide Directorate of Education FATA Endst. No.3761-22 dated 07/04/2014.

Later on, the same upgradation of various posts has been withdrawn by Directorate of Education FATA vide its letter No.10322-52 dated 16/09/2014. But sense then you are getting salary /allowances of senior TT. In this connection you are hereby directed to submit Pay Roll and service book so that recovery be made from you as per rules/regulation and policy.

District Education Officer
Mohmand Tribal District

dated 14 / 2 / 2020

Endst.No

Copy to

1. PS to Secretary Education Elementary & Secondary Khyber Pakhtunkhwa Peshawar.
2. PA to Director of Education Elementary & Secondary Khyber Pakhtunkhwa Peshawar.
3. Additional Director of Education NMDs Peshawar.

District Education Officer
Mohmand Tribal District