

861/2013

02.02.2023

Clerk of learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 08.03.2023 before the D.B.



(FAREEHA PAUL)  
Member(E)



(SALAH-UD-DIN)  
Member (J)

SCANNED  
KP&T  
Peshawar

4<sup>th</sup> Nov. 2022

Lawyers are on strike today.

To come up for arguments on 12.12.2022 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.



(Farecha Paul)  
Member(E)



(Kalim Arshad Khan)  
Chairman

12.12.2022

Counsel for the appellant present.

Mr. Muhammad Riaz Khan Painsdakhel, Assistant Advocate

General for the respondents present.

Learned counsel for the appellant requested for adjournment in order to further prepare the brief. Adjourned but as last chance.

To come up for arguments on 02.02.2023 before the D.B.

**SCANNED**  
**KPST**  
**Peshawar**



(FAREEHA PAUL)  
Member(E)



(ROZINA REHMAN)  
Member (J)

26<sup>th</sup> May, 2022

Counsel for the appellant present. Mr. Muhammad Rasheed, Deputy District Attorney for respondents present.

Learned counsel for the appellant seeks time to further prepare the brief. Adjourned. To come up for arguments on 09.06.2022 before D.B.



(Fareeha Paul)  
Member(E)



(Kalim Arshad Khan)  
Chairman

9.6.22

*proper D.B is an Tawar, therefore the case is adjourned to 29.8.22 for same.*



29.08.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

The Lawyers are on strike and Learned Member (Judicial) Ms. Rozina Rehman is also on leave, therefore, arguments could not be heard. Adjourned. To come up arguments on 27.09.2022 before the D.B.



(Salah-Ud-Din)  
Member (Judicial)

27.09.2022

Junior to counsel for appellant present.

Muhammad Jan, learned District Attorney for respondents present.

Due to general strike of the bar, case is adjourned to 04.11.2022 for hearing before D.B.



(Fareeha Paul)  
Member (E)



(Rozina Rehman)  
Member (J)

30.08.2021

Due to summer vacations, the case is adjourned to 12.11.2021 for the same as before.



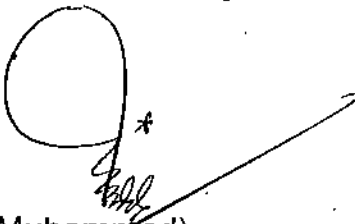
READER

12.11.2021

Junior of learned counsel for the appellant present.

Kabirullah Khattak, Adll: AG for respondents present.

Former requests for adjournment on the ground that learned senior counsel (Noor Muhammad Khattak) is indisposed today. Adjourned. To come up for arguments on 28.02.2022 before D.B.



(Mian Muhammad)  
Member (E)



(Rozina Rehman)  
Member (J)

28.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 26.05.2022 for the same as before.



Reader


861/2013

23.11.2020

Counsel for the appellant, Asstt. A.G for respondents present.

To come up for hearing before the D.B on 07.01.2021 alongwith Service Appeal No. 253/2015.


  
(Mian Muhammad)  
Member

  
Chairman

07.01.2021

Junior to counsel for the appellant and Assistant A.G for the respondents present.

To come up for hearing on 24.02.2021 before D.B alongwith Service Appeal No. 253/2015.


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


  
Chairman

24.02.2021

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

Former requests for adjournment as learned senior counsel for the appellant is engaged before the Darul Qaza Bench of Peshawar High Court at Swat. Adjourned to 10.05.2021 but against costs of Rs. 1000/- to be paid by the appellant.

  
(Mian Muhammad)  
Member(E)

  
Chairman

10.05.2021

Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 30.08.2021 for the same as before.

  
Reader

23.11.2020

Counsel for the Appellant, Asstt. A.G. along with  
official respondents and counsel for private respondent No. 5  
(present) present.

Counsel for private respondents No. 5 states  
To come up for hearing before the D.B. on  
07.01.2021 along with Service Appeal No. 253/2015.  
therefore, requests for adjournment. Adjourned to  
07.01.2021 for hearing before the D.B. along with Service

Appointed: 25/11/2020  
(Mian Muhammad)  
Member

Chairman

(Mian Muhammad)  
Member

Chairman

23.04.2020

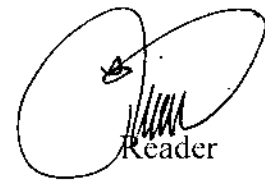
Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 04.08.2020 before D.B.



Reader

04.08.2020

Due to summer vacation case to come up for the same on 15.10.2020 before D.B.




Reader

15.10.2020


Appellant present through counsel.

Kabir Ullah Khattak learned Additional Advocate General present.

To come alongwith connected appeal on 23.11.2020 before D.B.



(Mian Muhammad)  
Member (E)



(Rozina Rehman)  
Member (J)


17.01.2020

Abdul Mateen attorney of the appellant on behalf appellant present. Lawyers community is on strike on the call of Khyber Pakhtunkhwa Bar Council. Learned Member (Executive) is not available. Adjourned for 17.02.2020 before D.B.

  
Member

17.02.2020

Counsel for the appellant present. Asst: AG for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned To come up for arguments on 10.03.2020 before D.B.

  
Member

  
Member

10.03.2020

Junior to counsel for the appellant present. Mr. Usman Ghani learned District Attorney, for the respondents present. Junior to counsel for the appellant requested for adjournment on the ground that senior counsel for the appellant is not available today. Adjourn. To come up for arguments 23.04.2020 before D.B.

  
Member

  
Member



30.09.2019


Due to general strike of the bar, the case is adjourned to  
30.10.2019 before D.B.

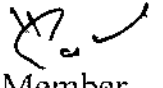
  
Member

  
Member

30.10.2019

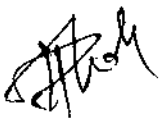
Learned counsel for the appellant present. Mr. Zia Ullah  
learned Deputy District Attorney present. Learned counsel  
for the appellant seeks adjournment. Adjourned by way of  
last chance. To come up for arguments on 09.12.2019 before  
D.B.


  
Member

  
Member

09.12.2019

Lawyers are on strike on the call of Khyber Pakhtunkhwa  
Bar Council. Adjourn. To come up for further  
proceedings/arguments on 17.01.2020 before D.B.

  
Member

  
Member

28.05.2019

Counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 05.07.2019 for arguments before D.B.


  
(HUSSAIN SHAH)  
MEMBER

  
(M. AMIN KHAN KUNDI)  
MEMBER

05.07.2019

Junior to counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present. Junior to counsel for the appellant seeks adjournment as senior counsel for the appellant is not in attendance. Adjourn. To come up for arguments on 13.09.2019 before D.B.


  
Member

  
Member

13.09.2019

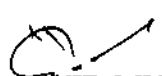
Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney alongwith Irfan Assistant for respondents present. Adjournment requested. Adjourn. To come up alongwith connected service appeal filed by the appellant, on 30.09.2019 before D.B.

  
Member

  
Member

06.03.2019

Junior counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondent present. Junior counsel for the appellant seeks adjournment on the ground that learned senior counsel for the appellant is busy before the Hon'ble Peshawar High Court. Adjourn. To come up for arguments on 05.04.2019 before D.B.

  
(M. HAMID MUGHAL)  
MEMBER

  
(M. AMIN KHAN KUNDI)  
MEMBER

05.04.2019

Mr. Mir Zaman Advocate for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present.

A request for adjournment is made due to indisposition of learned senior counsel for the appellant. Adjourned to 29.04.2019 before D.B.

  
Member

  
Chairman

29.04.2019

Junior to counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Junior to counsel for the appellant requested for adjournment as senior counsel for the appellant is not in attendance. Adjourn. To come up for arguments on 28.05.2019 before D.B.

  
Member

  
Member

20.11.2018

Junior counsel for the appellant present. Mr. Muhammad Riaz Khan Painsdakhel, Asst: AG for respondents present. Junior to counsel for the appellant requests for adjournment on the ground that learned senior counsel for the appellant is in appearance before Daar Ul Qaza at Swat today. Adjourned to 14.01.2019 for arguments before D.B.

  
Member

  
Chairman

14.01.2019

Junior to counsel for the appellant present. Mr. Muhammad Jan, DDA for respondents present. Junior to counsel for the appellant seeks adjournment on the ground that senior counsel for the appellant is not available today. To come up for arguments on 04.02.2019 before D.B.

  
(Ahmad Hassan)  
Member

  
(M. Amin Khan Kundi)  
Member

04.02.2019

Junior to counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney for official respondents present. Learned counsel for private respondent also present. Junior to counsel for the appellant seeks adjournment as senior counsel for the appellant is not in attendance. Adjourn. To come up for arguments on 06.03.2019 before D.B.

  
Member

  
Member

10.05.2018

The Tribunal is defunct due to retirement of Hon'ble Chairman. Therefore, the case is adjourned. To come up on 25.07.2018.

  
READER

25.07.2018

Since 25.07.2018 has been declared as public holiday on account of General Election. Therefore, case is adjourned on 28.08.2018 before D.B

  
READER

28.08.2018

Counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 08.10.2018 before D.B.


  
(Ahmad Hassan)  
Member

  
(Muhammad Amin Khan Kundi)  
Member

08.10.2018

Learned counsel for appellant and Mr. Zia Ullah learned Deputy District Attorney present. Learned counsel for appellant seeks adjournment. Adjourn. To come up for arguments on 20.11.2018 before D.B

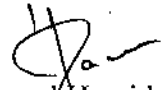
  
(Hussain Shah)  
Member

  
(Muhammad Hamid Mughal)  
Member

14.11.2018


Junior to counsel for the appellant present. Mr. Zia Ullah, Deputy District Attorney for the respondents present. Junior to counsel for the appellant seeks adjournment. Adjourn. The appellant is also directed to submit spare copy of the instant appeal on or before the next date of hearing: To come up for arguments on 18.01.2018 before D.B.


  
(Gul Zeb Khan)  
Member (E)

  
(Muhammad Hamid Mughal)  
Member (J)

16.01.2018

Appellant in person present. Mr. Muhammad Jan, DDA for the respondents present. Appellant seeks as <sup>adjournment</sup> his senior counsel is not in attendance. Adjourn. To come up for arguments on 14.03.2018 before D.B.


  
(Gul Zeb Khan)  
Member (E)

  
(Muhammad Hamid Mughal)  
Member (J)

14.03.2018

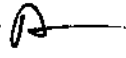
Appellant absent. Learned counsel for the appellant is also absent. However, junior to learned senior counsel for the appellant present and seeks adjournment. Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Adjourned. To come up for arguments on 10.05.2018 before D.B.

  
(Muhammad Amin Khan Kundi)  
Member

  
(Muhammad Hamid Mughal)  
Member

19.09.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Rejoinder not submitted. Counsel for the appellant requested for time to file rejoinder. Request accepted. To come up for rejoinder and arguments on ~~18-1-17~~

  
Member

  
Member

18.01.2017

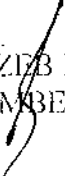
Counsel for appellant and Mr. Muhammad Adeel Butt, Additional AG for respondents present. Learned counsel for appellant submitted rejoinder and copy whereof handed over to learned Additional AG. To come up for arguments on 05.06.2017 before D.B.


  
(AHMAD HASSAN)  
MEMBER

  
(ASHFAQUE TAJ)  
MEMBER

05.06.2017


Clerk of the counsel for appellant present. Mr. Muhammad Adeel Butt, Additional AG for the respondents also present. Due to strike of the bar learned counsel for the appellant is not in attendance. Adjourned. To come up for arguments on 28.09.2017 before D.B.

  
(GUL ZEB KHAN)  
MEMBER

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

28.09.2017

Junior to counsel for the appellant and Mr. Muhammad Jan, DDA for the respondents present. Seeks adjournment as learned counsel for the appellant is not in attendance. Adjourned. To come up for arguments 14.11.2017 before the D.B. Member Copy may also be provided before the date fixed.

  
Member

  
Chairman

22.09.2015

Counsel for the appellant, M/S Khurshid Khan, SO and Irshad Muhammad, SO alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 30.11.2015 before S.B.

  
Chairman

30.11.2015

Counsel for the appellant, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 24.3.2016 before S.B.

  
Chairman

24.03.2016

Counsel for the appellant, M/S Khurshid Khan, SO and Hameed-ur-Rehman, AD (lit.) alongwith Assistant AG for respondents present. Written reply not submitted despite last opportunity. Requested for further adjournment. Last opportunity is extended subject to payment of cost of Rs. 1000/- which shall be borne by the respondents from their own pockets. To come up for written reply/comments and cost on 26.5.2016 before S.B.

  
Chairman

26.05.2016


Agent of counsel for the appellant and M/S. Khurshid Khan, SO, Hameedur Rahman, AD and Muhammad Irshad SO for the respondents present. Written reply submitted. Cost of Rs. 1000/- paid and receipt thereof obtained from the learned counsel for the appellant. The appeal is assigned to D.B for rejoinder and final hearing for 19.09.2016.

  
Chairman




20.05.2015

Clerk of counsel for the appellant and Asstt: AG for the respondents present. Clerk of counsel for the appellant submitted an application for adjournment. Adjourned to 12.06.2015 for preliminary hearing before S.B.

  
Member

12.06.2015

 Counsel for the appellant and Assistant A.G for respondents present. Learned counsel for the appellant argued that the appellant is serving as SET (BPS-17). That she was initially appointed as SET (BPS-16) on 25.3.1996. That private respondent No. 5 in appeal No. 253/2015 was also appointed in a later selection on the same date and thus junior to appellant. That vide order dated 26.2.2013 the said private respondent was promoted while appellant ignored without any lawful justification and despite entitlement being senior to said private respondent. That the appellant preferred departmental appeal on 11.3.2013 which was rejected by the appellate authority vide order dated 5.4.2013 and hence the service appeal on 6.5.2013.

That the appellant is entitled to promotion in preference to private respondent No. 5 in the light of Rule 17 (a) of APT Rules, 1989.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 22.9.2015 before S.B.

  
Chairman

24.

24.02.2015

Clerk of counsel for the appellant and Asst: AG for the respondents present. Appellant sent a copy of departmental appeal as well as seniority list vide this office diary No. 75-A dated 13.02.2015 which is placed on file. Clerk of counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 19.03.2015.



Member

25.

19.03.2015

Assistant to counsel for the appellant with Asst: AG for the respondent present. Learned counsel for the appellant is stated busy before the august High Court, Peshawar. Requested for adjournment. Adjourned for preliminary hearing on 21.04.2015 before S.B.



Member

26.

21.04.2015

Counsel for the appellant and Asst: AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned for preliminary hearing to 20.05.2015 before S.B.



Member

Reader Note:

21.  
05.12.2014

Clerk to counsel for the appellant and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Since the Tribunal is incomplete, therefore, case is adjourned to 29.12.2014 for the same.

  
Reader

Reader Note:

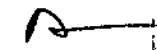
22  
29.12.2014

Clerk of counsel for the appellant and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Since the Tribunal is incomplete, therefore, case is adjourned to 02.02.2015 for the same.

  
Reader

23  
02.02.2015

Counsel for the appellant and Mr. Mosam Khan, AD with Mr. Kabirullah Khattak, Asst: Advocate General for the respondent present. Representative of the respondents submitted Seniority list of the appellant, copy whereof is handed over to the learned counsel for the appellant. To come up for further preliminary hearing on 24.02.2015.

  
Member

18-

24.09.2014

Counsel for the appellant and Mr. Sajjad Rashid, Assistant Director with Mr. Ziaullah, GP for the respondents present. Representative of the respondents requested for time to submit complete record of the appellant. Request accepted. To come up for preliminary hearing on 16.10.2014.



Member

19.

16.10.2014

Counsel for the appellant and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. The learned AAG requested for further time to contact the respondents for submission of complete record of the appellant. Last chance is given to the respondents for submission of complete record. The learned AAG also directed to contact the respondents to produce the requisite record on the next date. To come up for preliminary hearing on 07.11.2014.



Member

20.

07.11.2014

Mr. Abdul Mateen, Attorney for the appellant and Miss. Samina Ghani, DEO (F), Peshawar (official respondent No.7) in person with Mr. Kabirullah Khattak, Asst: AG for the respondents present. To come up for preliminary hearing on 05.12.2014 as per order sheet dated 16.10.2014.




Member

15

01.07.2014

Counsel for the appellant and Mr. Ziaullah, GP present. Representatives of the respondents are absent. The learned GP submitted before the Court that he sent a letter to the respondents for production of complete record of the appellant, but today they are absent. He requested for further time to contact the respondents. The learned GP is further directed to ensure attendance of the respondents and submit complete record of the appellant as per order sheet dated 04.06.2014. To come up for further preliminary hearing on 20.08.2014.

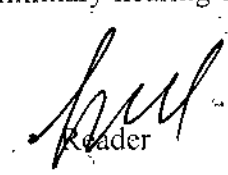
  
Member

16

Reader Note.

20.08.2014

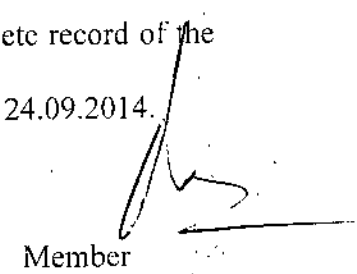
Clerk to counsel for the appellant and Mr. Ziaullah, GP for the respondents present. The Hon'able Bench is on tour to Abbotabad, therefore, case to come up for preliminary hearing on 02.09.2014.

  
Reader

17

02.09.2014

Counsel for the appellant and Mr. Kabirullah Khattak, Assistant Advocate General for the respondents present. Learned AAG requested for time for production of complete record of the appellant. To come up for preliminary hearing on 24.09.2014.

  
Member

13.

08.05.2014


Counsel for the appellant and Mr. Ziaullah GP present. Vide order sheet dated 10.02.2014, the respondent No.7 was directed to bring complete record of the case of the appellant particularly departmental appeal, if any, and final seniority list, if any but today representative of respondent No.7 is absent. The learned GP once again directed to contact the respondent to produce the requisite record on the next date. To come up for preliminary hearing on 04.06.2014.

  
Member

14,

04.06.2014

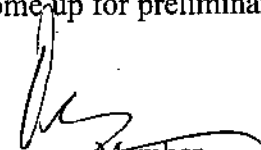
counsel for the appellant and Mr. Ziallah, GP present. Vide order sheet dated 10.02.2014 the respondent No. 7 was directed to bring the complete record of the case of appellant particularly departmental appeal, if any, and final seniority list, if any but today representative of respondent No.7 is absent. The learned GP once again directed to contact the respondent to produce the requisited record on the next date. To come up for preliminary hearing on 01.07.2014.

  
Member

10.

24.02.2014


Clerk of counsel for the appellant and Mr. Zia Ullah, GP for the respondents present. Preliminary arguments could not be heard due to general strike of the Bar. To come up for preliminary hearing on 10.03.2014.

  
Member

11.

10.03.2014

Clerk of counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on 24.04.2014.

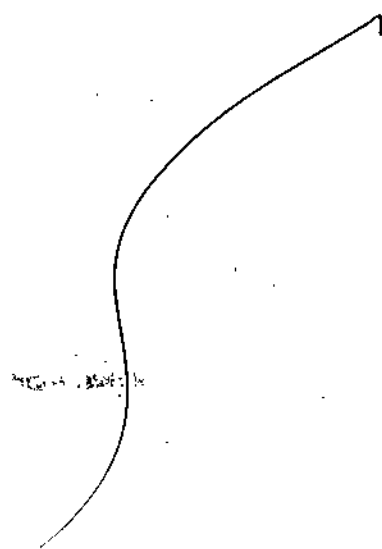
  
Member

12.

24.04.2014

No one is present on behalf of the appellant. Mr. Ziaullah, GP for the respondents present. To come up for preliminary hearing on 08.05.2014.

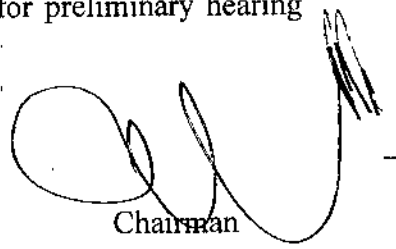
  
Member



8.

09.12.2013

Mr. Abdul Mateen, Attorney for the appellant, on behalf of the appellant present. M/S Khurshid Ali, SO and Mosam Khan, AD are present in other cases and stated at the Bar that they have not received any notice in this case so far. Mr Muhammad Adeel Butt, AAG is also present. The representatives of the respondent-department are directed to bring complete record of the case, particularly record of the departmental appeal; and appeal to come up for Preliminary hearing on limitation, as impugned appellate order is dated 05.04.2013 while appeal has been lodged on 06.05.2013, and also maintainability of the appeal as the same has been lodged for promotion. To come up for preliminary hearing on 10.02.2014.

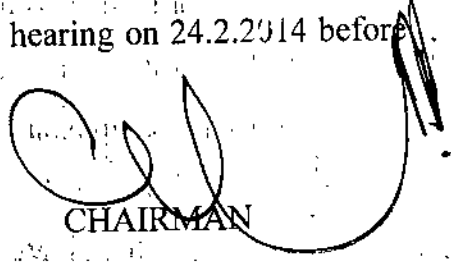


Chairman

9.

10.2.2014

Mr. Abdul Mateen, Attorney for the appellant with counsel for the appellant present. Mr. Noor Muhammad, Advocate filed wakalatnama on behalf of the appellant, Mr. Khursheed Khan, SO for respondents No. 1 & 2, Mosam Khan, AD for respondents No. 3 & 4 and Aziz Khan, C.T Teacher on behalf of respondent No.7 with AAG for the respondents present. The requisite record produced, and request for further time made on behalf of the respondents. Representative of the respondent No. 7 is directed to bring complete record of the case of the appellant particularly departmental appeal, if any, and final seniority list, if any, for preliminary hearing on 24.2.2014 before the learned Primary Bench.



CHAIRMAN



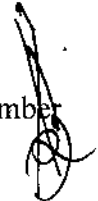
6  
4.11.2013

Mr. Abdul Mateen, attorney for the appellant present. In order to verify the power of attorney, the appellant be summoned to attend the Tribunal personally. To come up for preliminary hearing on 26.11.2013.

  
MEMBER

7  
26.11.2013

Appellant with Mr. Abdul Mateen, Attorney for the appellant and Mr. Zia Ullah, GP for the respondents present. Appellant stated at the Bar that Mr. Abdul Mateen, is their attorney for which proper Power of Attorney written and submitted before the Tribunal so far as the question of Power of attorney is concerned it has become settled but now the question is as to whether the attorney can argue the case before the Tribunal or otherwise. To come up for clarification and further preliminary hearing on 09.12.2013.

  
Member

04.07.2013

Attorney of the appellant present. In pursuance of the Khyber Pakhtunkhwa Service Tribunals (Amendment) Ordinance, 2013, (Khyber Pakhtunkhwa ord. II of 2013), the case is adjourned on note Reader for proceedings as before on 28.08.2013.

preliminary arguments were heard on 27.9.2013. The case is adjourned on note Reader for proceedings as before on 28.08.2013.

28.08.2013

Attorney/for the appellant present. ~~He~~ <sup>who is not a legal practitioner</sup> wants to argue the case himself. Therefore Pre-admission notice be issued to the Sr.GP/GP for preliminary arguments on 27.9.2013 *to assist the tribunal*.

Member

27.09.2013

Attorney who is not legal practitioner for the appellant requested for adjournment. To come up for preliminary arguments on order sheet dated 28.08.2013 on 04.11.2013.

Member


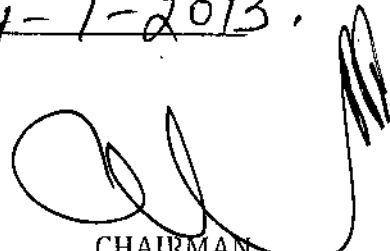
Pre-admission!

4.

Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 861/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08/05/2013	<p>The appeal of Mst. Farzana Bano resubmitted today by her may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	14-5-2013	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>4-7-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mst. ~~Farzana Bano~~ received today on 06/05/2013 is returned to the appellant with the direction to submit one copy/set of the appeal along with annexure i.e. complete in all respect, within 10 days.

No. 752 /S.T,  
Dt. 06/05 /2013

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR

Mrs. Farzana Bano appellant.

*Resubmitted after doing the needful*

*Date 8/6/2013*

*Asad Malik*  
*(Attorney of the Appellant)*

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**Service Appeal No. 861 /2013.**Mst: Farzana Bano Vs Secretary E&SE, K.P.K. Peshawar.**

## INDEX

S#	Description of Documents	Annexures	Page
1	Appeal with Affidavit	-	1 to 4
2	Relevant Pages of Service Book showing entry in service on 11.03.1978	A	5 to 9
3	Selection & Appointment order dated 25.03.1996 as S.E.T.	B	10 to 11
4	Notification for fixation of Pay dated 06.03.1999.	B-I	12 to 13
5	Selection and Appointment order of Naz Perveen as S.E.T. dated 25.03.1996.	C	14 to 16
6	Orders of Up-gradation in BPS-17	D & D-I	17 to 18
7	Applications for Promotion	E&F	19 to 20
8	Impugned Order	G	21 to 26
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10	Appellate Order	I	27 to 33
11	Promotion Policy	J	34 to 37
12	Qualification documents	I	38 to 44
13	Power of Attorney with original	-	-

Complete and correct

Dated 6 /5/2013.
  
 Appellant

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.Service Appeal No. 861 /2013.

Mst: Farzana Bano D/O Ghulam Hussain  
(S.E.T) Headmistress, Government Girls Middle School,  
New Jehangir Pura, Wazir Bagh Road Peshawar.

K.W.P. Peshawar  
No. 878  
Dated 06/5/13

Appellant

VERSUS

1. The Secretary to the Government of Khyber Pakhtunkhwa, Elementary & Secondary Education, Civil Secretariat, Peshawar.
2. The Chief Secretary to the Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. The Deputy Directress (Establishment) Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
4. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
5. The Secretary to the Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar.
6. The Secretary to the Government of Khyber Pakhtunkhwa, Finance Department, Civil Secretariat, Peshawar.
7. The District Education Officer (Females) G.T. Road, Peshawar.

Respondents

**APPEAL AGAINST THE IMPUGNED ORDER OF THE SECRETARY TO GOVERNMENT OF KHYBER PAKHTUNKHWA, ELEMENTARY & SECONDARY EDUCATION DEPARTMENT (RESPONDENT NO.1) DATED 26.02.2013, AND THE IMPUGNED APPELLATE ORDER OF RESPONDENT NO.3, DATED 05.04.2013 WHEREBY THE APPELLANT'S RIGHT OF PROMOTION AS HEADMISTRESS ON REGULAR BASIS HAS UNLAWFULLY BEEN REJECTED.**

**PRAYER IN APPEAL**

**SETTING ASIDE THE IMPUGNED ORDERS, DATED 26.02.2013 AND 05.04.2013, THE APPELLANT MAY KINDLY BE ALLOWED PROMOTION AS HEADMISTRESS ON REGULAR BASIS W.E.F 26.02.2013 WITH ALL BACK BENEFITS.**

Sheweth,

The Appellant respectfully submits as under:-

1. That the Appellant had joined the Elementary & Secondary Education Department as a trained PST teacher on 11.03.1978(copies of the relevant pages of the Service Book showing entry to this effect are annexed as "A").
2. That the Appellant while in service was selected and appointed as S.E.T, (BPS-16) vide order dated 25.03.1996(copy of the order annexed as "B"). The pay of the appellant was fixed in accordance with the circular letter of the Government of Khyber Pakhtunkhwa, Finance Department, No. FD(PRC)1-1/97, dated 16.03.1999(copy of the order annexed as "B-I").
3. That under a similar order dated 25.03.1996, one Naz Perveen was also selected and appointed as S.E.T in (BPS-16) (copy of the orders annexed as "C").
4. That the Appellant and other S.E.Ts including Naz Perveen were upgraded in BPS-17 w.e.f. 01.10.2007(copy of the policy/letter annexed as "D"and "D-I").
5. That the Appellant submitted applications for the grant of promotion as Headmistress to the competent authority on 26.06.2012 and 14.12.2012 but to no response (copies of the applications are annexed as E&F).
6. That the Respondent No.1 has issued the Impugned Order dated 26.02.2013, whereby 99 S.E.Ts have been regularly promoted as headmistresses but the Appellant has been deprived of her promotion (copy of the Impugned Order annexed as "G").
7. That being aggrieved by the Impugned Order dated 26.02.2013, the Appellant submitted a departmental appeal before the Chief Secretary (Respondent No.2) on 11.03.2013, for the redressal of her grievance (copy of the department appeal annexed as "H").
8. That the departmental appeal has been rejected by the Deputy Directress (Respondent No.3) through the Appellate Order dated 05.04.2013 (copy of the order annexed as "I").The Appellant received the said order on 10.04.2013 by post.
9. That under the circumstance the appellant has no other option open to her but to file this Appeal before this Honorable Tribunal for the redressal of her grievance on the following amongst the other grounds.

**GROUND:**

- a) That the Impugned Order dated 26.02.2013 and the Appellate order dated 05.04.2013 are unlawful, void, arbitrary, malafide, illegal and as such without lawful authority.
- b) That the Impugned Order dated 26.02.2013 has no legal footing. The valid and lawful orders are always based on legal and valid seniority list. But in this case no proper and lawful seniority list has been prepared and

maintained for issuing the promotion order. So Impugned Order dated 26.02.2013 is not a valid order but it is discretionary.

- c) That the teacher appearing at Serial No.1 (Naz Parveen), of Impugned Order and the Appellant both were selected and appointed as S.E.Ts on the same date ie 25.03.1996. Therefore, awarding her and discarding the Appellant is the worst example of discrimination.
- d) That Naz Parveen had joined the service as C.T on 05.01.1985, while the Appellant entered the service as PST on 11.03.1978. Therefore, the appellant has rendered much more service than Naz Parveen. So depriving Appellant of her due right is an act of injustice.
- e) That the service of the Appellant right from 11.03.1978 till date is continuous. So far the Appellant has rendered 35 years service with good record. Unfortunately the Respondent No.1 ignored all these facts and figures. Under the Policy/Rules dated 28.01.2009, the promotion on the non selection post is always made on the basis of seniority cum fitness. The Respondent No.1 badly failed to count the lengthy service of the appellant rendered by her w.e.f 11.03.1978 to 24.03.1996, and as such deprived the appellant of her promotion. Therefore, Non-counting of such a lengthy period of 18 years service towards the seniority of the Appellant is an act of injustice and discrimination (copy of the Policy/Rules dated 28.01.2009 is annexed as "J").
- f) That even in the academic and professional fields of education the Appellant is much more qualified than the promotee appearing at S No.1, of the Impugned Order. The Appellant possesses the qualification of M.A, M.Ed, while Naz Parveen is B.A B.Ed(Qualificational documents annexed as "K" and "K-I").The Appellant is much more senior to the person appearing at S No.1 and the other awardees.
- g) That the Appellant is not only fit for promotion as Headmistress on regular basis in BPS-17, but she is also fit for promotion to BPS-18 on the basis of lengthy service of more than 35 years with good record under the policy dated 28.01.2009.
- h) That the Appellant is also entitled to be promoted as Headmistress (BPS-17) on regular basis from the same date ie 26.02.2013.
- i) That the appellant shall also rely on the additional grounds after filing the written statement by the Respondents.
- j) That under the circumstance as mentioned above the Impugned Order dated 26.02.2013 and Appellate Order dated 05.04.2013 are liable to be set aside.



It is humbly prayed that setting aside the Impugned Appellate Order dated 05.04.2013, and setting aside or modifying the Impugned Order dated 26.02.2013, the Appellant may kindly be allowed promotion as a Headmistress (BPS-17) on regular basis w.e.f 26.02.2013, with all back benefits and this Appeal may please be accepted against the Respondents with cost.

Dated 6/05/2013

  
**Mst: Farzana Bano**  
**(Appellant)**

N.B The addresses of the parties given in the heading of this appeal are correct and sufficient for service.

---

Affidavit

I, Farzan Bano (Appellant) do hereby solemnly affirm that the contents of the accompanied Appeal are correct and true to the best of my knowledge and belief and that nothing has been concealed from the notice of this Honorable Tribunal

Dated 6/5/2013.

  
Deponent

**ATTESTED**  
Mukhtar Ahmed Ghaznavi  
NOTARY PUBLIC  
District Courts Peshawar

*Muhammad Ghaznavi*  
6-5-2013

I

SERVICE BOOK

OF

old personnel

NO 3881048

FARZANA BANO

PTC/SET

40 GHULAN HUSSAIN

New Personnel No, 14824

(For use in Police Department only).

- 1. \_\_\_\_\_
- 2. \_\_\_\_\_
- 3. \_\_\_\_\_

Verification Roll No. \_\_\_\_\_ dated \_\_\_\_\_ received back \_\_\_\_\_

Left thumb-impression.

Qualifications	Date	Qualifications	Date
English - <i>passed BEd: Exam: Annual-1991 from Peshawar University and Roll No: 205 in 2nd Division &amp; result was declared on 27-1-1992.</i>		First Arts	
Plan-drawing		B. L. or B. A.	
Finger print		Pledershp examination	
Drill instruction		Training School final- examination	
Court duties		Other qualifications—	
Reserve duties		<i>Passed S.S.C. Examination held in March/April, 1976 in the C grade securing 500 marks out of 900/1100 Under Roll No 15282</i>	

*Attest*  
 By: District Inspector of Schools  
 (Female), Peshawar  
 15/12/98

*Attest*  
 June 23

B. Z. Khan  
 District Inspector of Schools  
 Peshawar

2. Sig  
of  
Off

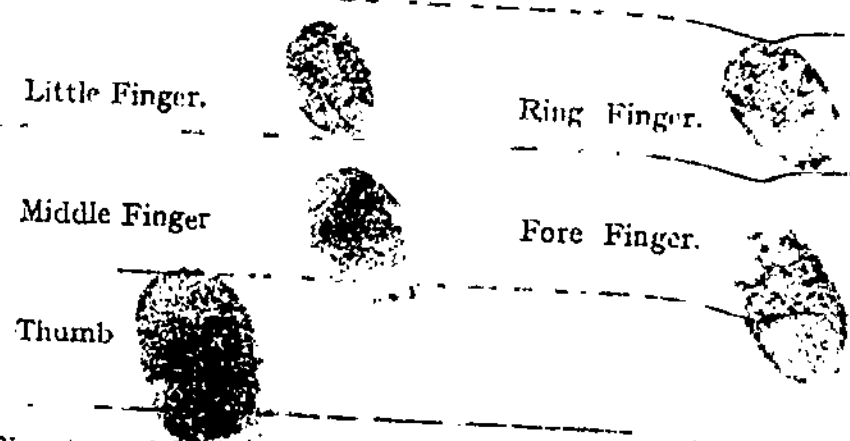
Note—The entries in this page should be renewed or re-attested at least every five years, and the signature in lines 9 and 10 should be dated.

- 1. Name ... *Farzana Bano*
- 2. Race ... *Awan*
- 3. Residence ... *HN: 951 Mahala Begum Shahi  
Peshawar city*
- 4. Father's name and residence ... *Ghulam Hussain w above*
- 5. Date of birth by Christian Era as nearly as can be ascertained. ... *5.1.1959  
Fifth January A.H. Fifty nine*

6. Exact height by measurement ...

7. Personal marks for identification ... *5'6*

8. Left hand thumb and finger impression of (non-gazetted) officer ... *R.S.M. on the left side of hand*



*Attested  
[Signature]*

9. Signature of Government servant ... *Farzana Bano*

10. Signature and designation of the Head of the Office, or other Attesting Officer ... *D. Z. Khan*  
District Inspector of ...  
Khyber Agency ...  
F. R. Peshawar

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating state - (i) substantive appointment or (ii) whether service counts for pension under Art. 371, C. S. R.	Pay in substantive post	Additional pay for officiating	Other emoluments falling under the term 'Pay'	Date of appointment	Signature of Government servant
L. G. P. S. Ashraf Kelli. Rajasthan			315/- P.M.			11-3-78	Farzana B.
Dte L. G. P. S. Ashraf Kelli	Gen/Pl		315/- P.M.			1-6-78	Farzana B.
Dte L. G. P. S. Sun Kumar	- Do -		315/- P.M.			25-7-78	Farzana B.
Dte	- Do -		315/- P.M.			1-12-78	Farzana B.
- Do -	- Do -		327/-			1-12-78	Farzana B.
- Do -	- Do -		339/-			1-12-79	Farzana B.
- Do -	- Do -		357/-			1-12-80	Farzana B.
		Approved Juni	363/-			7-1-81	Farzana B.
			375/-			12-1-81	Farzana B.
L. G. P. S. Katta Kashi Dte			387/-			12-1-82	Farzana B.



NOTIFICATION.

Consequent upon their selection by the Departmental Selection Committee the Director Secondary Education NWFP., Peshawar has been pleased to appoint the following trained General/Science B.Ed ( In service) against S.E.T. Post at the Schools noted against their names in BPS-16 (Rs.2535-197-5450) Plus usual allowances as admissible under the rules with immediate effect subject to the existing terms & Conditions:-

S.No.	Name and Address.	D/O B.Ed Result	School	Remarks.
<u>GENERAL B.ED.</u>				
1.	Shaheen Akhtar B.A.B.Ed. GGHS, Samand Khan Killi.	20.8.91	GGHS Samand Khan Killi FR Peshawar.	Against vacant S.E.T. Post.
2.	Farzana Bano M.A.F.Ed. PTC GGPS Jehangir Pura Peshawar.	27.4.92	GGMS Ba. Mohammad Kot Mohmond Agency.	-do-
3.	Miaz Parwar M.A.BED CT GGMS Sana Ghundi Mohmond Agency.	15.4.93	GGMS Sana Ghundi, M. Agency	-do-
4.	Abida Inayat BA BED CT GGMS Akbar Abad Takht Bhai.	8.5.94	GGHS, Fakaghur Mohmond Agency.	-do-
5.	Wiqarun Nisa MA B Ed CT GGMS, Khirgi FR, DI Khan.	21.5.95.	GGMS, Miranshah NWA.	-do-
6.	Robia Gul MA BED CT GGMS, Gheriwala Bannu.	12.10.95	GGMS, Hassu Khel NWA.	-do-
7.	Bibi Romina Begum MA BED PTC GGPS Sango Takht Bhai.	21.5.95	GGHS, Khar Bajawar Agency.	-do-
8.	Gul Nisa BA BED CT GGMS Jahadir Maghul Khel Bannu.	12.10.95	GGMS Azad Pir Kot NWA.	-do-

TERMS & CONDITIONS.

1. They will be governed by such rules and regulation as may be prescribed by the Govt. from time to time for the category of the Govt. Servants to which they belong.
2. Their Service will be liable to termination on one month notice for either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
3. They should join the posts within one month of the issue of this Notification.
4. Their inter-se-seniority will be determined in accordance with the merit of Departmental Selection Committee.
5. Charge should be submitted to all concerned.
6. They shall be on probation for a period of two years.
7. Their original Certificates/Degrees should be checked and verified from the concerned University Immediately.
8. Service Book of the teachers must be checked before handing over charge.
9. The declaration of Assets should be obtained from them immediately and placed on record.
10. N.T.A.D.A. is allowed.
11. They are required to produce Health & Age Certificates from Medical Authorities, concerned before taking over charge.

*(Signature)*

(SYED ABU SAIED BACHA)  
DIRECTOR OF SECONDARY EDUCATION,  
N.W.F.P. PESHAWAR.

( P-2- )

Order No. 81-130 /A467/SBT/Apptt:/FATA/

Dated Pesh: the 25 / 3 /1996.

Copy forwarded for information and n/action to the:-

- 1- Director Primary Education NWFP, Peshawar.
2. ~~Minister~~ Minister of Education (FATA) N.W.F.P., Peshawar.
3. Agency Accounts Officers concerned.
4. Agency Education Officers (Female) concerned.
5. Principals / Headmistress concerned.
6. Officials concerned.
7. P/3 to Secretary Education Govt: of NWFP, Peshawar.
8. P/A to Director Secondary Education NWFP, Peshawar.

*Aziz Khan*  
Deputy Director Secondary,  
For/Director of Secy: Education,  
N.W.F.P., Peshawar.

FOR: KHAN

*Attended*  
*[Signature]*



NO. FD(PRC ) 1-1/99

Dated Peshawar the, March 16, 1999.

To

1. All Administrative Secretaries to Govt. of NWFP, Peshawar.
2. The Senior Member Board of Revenue, NWFP.
3. The Secretary to Governor NWFP, Peshawar.
4. The Secretary to Chief Minister, NWFP.
5. The Secretary, Provincial Assembly, NWFP.
6. All Heads of Attached Departments NWFP.
7. All the Commissioners/Deputy Commissioners/Political Agents/District & Session Judges NWFP.
8. The Registrar, Peshawar High Court, Peshawar.
9. The Chairman, Service Tribunal NWFP, Peshawar.
10. The Chairman, NWFP, Public Service Commission.
11. The Secretary, Board of Revenue, NWFP, Peshawar.

SUBJECT:- FIXATION OF PAY ON APPOINTMENT TO A HIGHER POST FROM A LOWER POST BY INITIAL RECRUITMENT.

Sir,

I am directed to refer to the subject noted above and to say that rule 10(1) (i) of the NWFP, Civil Services Pay Revision Rules, 1978 provides that subject to the provisions of rule 11 thereof, where a Civil Servant is promoted from a lower to a higher post in Revised National Pay Scales 2 to 19 where the stage in the Revised National Pay Scale of the higher post, next above the pay of the Civil Servant concerned in the Pay Scale of the lower post gives a Pay increase equal to or less than a full increment of the pay scale of the higher post, the initial pay in the Revised National Pay Scale of the higher post shall be fixed after allowing a premature increment in the Revised National Pay Scale of the higher post.

2. It has been observed that in some cases the Government Servants holding lower posts secure appointment to higher posts by initial recruitment. They are deprived of the benefits available to the promotees in terms of rule 10(1) (i) of the NWFP, Civil Services Pay Revision Rules, 1978 referred to above. They are thus treated less favourably than those who are appointed to a higher post by promotion in normal course. This creates an anomalous situation.

3. It has, therefore, been decided that rule 10(1) (i) of the NWFP, Civil Services Pay Revision Rules, 1978 shall also equally apply

*Attest*  
*[Signature]*

in the cases where appointment to a higher post from a lower post is made by initial recruitment.

4. The orders in para 3 above would be effective from 01.05.1977 but no arrears will be allowed on account of defixtion of pay prior to 16.03.1999 i.e the date of issuance of this letter.

Your obedient servant

*M. Shahzad Arbab*  
( MUHAMMAD SHAHZAD ARBAB )  
ADDITIONAL SECRETARY-III,

ENDST. NO & DATE EVEN.

Copy forwarded for information to:-

- 1. All the Heads of Autonomous/Semi Autonomous Bodies/Corporations in NWFP, Peshawar.

*Muhammad Khan*  
( MUHAMMAD KHAN )  
DEPUTY SECRETARY (REGULATION)

ENDST. NO & DATE EVEN.

Copy forwarded to:-

- 1. The Accountant General, NWFP, Peshawar.
- 2. All the District/Agency Accounts Officers in NWFP.
- 3. The Treasury Officer, Peshawar.
- 4. The Private Secretary to Finance Minister, NWFP.
- 5. The P.S to Secretary, P.As to Additional Finance Secretaries, in Finance Department.
- 6. The Director, Local Fund Audit, NWFP, Peshawar.
- 7. All the Budget/Section Officers in Finance Department.

*Rashid Khan*  
( RASHID KHAN )  
SECTION OFFICER ( SR. I )

"N.A. KHALIL"

*Accepted*  
*[Signature]*

377000
13000
390000
12000
378000

APPPOINTMENT.

Consequent upon their selection by the Departmental Selection Committee, the Director of Secondary Education N.W.F.P., Peshawar has been pleased to appoint the following trained General/Science BEd (In-Service) against SET Posts at the Schools noted against their names in EPS-16 (Rs. 2535-197-5450) plus usual allowances as admissible under the rules with immediate effect subject to the existing terms and conditions:-

S.No.	Name and Address.	D/O Result B.Ed.	Schools.	Remarks.
<u>GENERAL BEd.</u>				
1.	Rashida Jan MA BEd SV GGHS, Chochian Gul Bela.	27.11.86.	GGMS, Sheikh Kelli Charsadda.	Against vacant S.E.T. Post.
2.	Usmat Begum MA BEd AT GGHS, Bicket Gunj, Mardan.	26.11.89.	GGMS, Katakhat, Mdn.	-do-
3.	Gulshan Taj MA BEd PTC GGHS, Landi Arbab, Peshawar.	26.11.89.	GGHS, Rashaki, ISR.	-do-
4.	Zubaida Begum MA BEd CT GGHS, Hayatabad, Peshawar.	26.11.89.	G.G.M.S. Punaltoon Garhi Nowshera.	-do-
5.	Naz Parveen BA BEd SET GGMS, Kurighar, Bara, K. Agency.	26.11.89.	GGMS, Kalyas, Chd.	-do-
6.	Jehan Zoha MA BEd SV GGMS, Pir Saadi, Mardan.	26.11.89.	GGMS, Kurampur Mdn.	-do-
7.	Sabiha Begum MA BEd DM GGHS, Nishtar Abad, Peshawar.	26.11.89.	GGMS, Mahzara, Chd.	-do-
8.	Zurriat Shaheen BA BEd CT GGMS, Kiga Wala, Peshawar.	26.11.89.	GGHS, Jalozai, ISR.	-do-
9.	Adam Bibi BA BEd GP GGHS No.1, Peshawar Cantt.	26.11.89.	GGHS, Maina, Swabi.	-do-
10.	Shamim Akhtar MA BEd SV GGHS No.1 Mardan.	26.11.89.	GGMS, Surkh Dhari, Mardan.	-do-
12.	Yasmin BA BEd SV GGMS, Baz Muhammad Kor, M. Agency.	26.11.89.	GGHS, Rustam, Mardan.	-do-
13.	Naz Ambaroon BA BEd L.C. SDEO (F) Nowshera.	04.02.89.	GGHS, Palosai Payah, Nowshera.	-do-
15.	Miraj Begum MA BEd CT GGHS, Nishtar Abad, Peshawar.	26.11.89.	GGHS, Nowshera Kalan.	-do-
15.	Umda Bibi BA BEd CV GGHS, Dabgari, Gate, Peshawar.	26.11.89.	GGHS, Ikrampur, Mardan.	-do-
15.	Bibi Zuhra BA BEd AT GGHS, Bicket Gunj, Mardan.	29.11.89.	GGMS, Chargulli, Mardan.	-do-
16.	Mubassara Qazi BA BEd CT GGHS, Zaida, Swabi.	26.11.89.	A.S.D.E.O. (F) Swabi.	-do-
17.	Hussan Ara MA BEd CT GGHS, Jogiwara, Peshawar City.	26.11.89.	GGMS, Dagi Qadeem, Nowshera.	-do-
18.	Sabiba Nasreen BA BEd AT GGHS, Tehkal Bala, Peshawar.	26.11.89.	GGMS, Nahaqi Gil Abad, Charsadda.	-do-
19.	Saima Naz MA BEd CV GGMS, Manyal, Dir.	08.11.90.	GGHS, Rustam, Mardan.	-do-
20.	Rakham Akhtar MA BEd CT GGHS, Dagai, Swabi.	08.11.90.	GGHS, Tomra, Swabi.	-do-

*Allocated*

SCIENCE BED.

1.	Tajjila Begum BSc BEI C.T. GGHS, Charsadda.	27.04.92.	GGHS, Shabqdar Fort Charsadda.	Against vacant SET (Sc.) Post.
2.	Humaira Shah MSc BED SET (UT) GGHS, Jamrud, Khy: Agency.	08.08.92.	GGHS, Shewa, Swabi.	-do-
3.	Yasmeen Usman MSc BED S.V. GGHS, Khar Bajaur Agency.	08.05.94.	GGHS, Takkar, Mardan.	-do-
4.	Nighat Shahveen MSc BEI PET GGMS, Lahor, Swabi.	08.05.94.	GGHS, Topi, Swabi.	-do-
5.	Musrat Jamal BSc BEI C.T. GGHS, Garhi Daulatzai.	08.05.94.	GGHS, Baghicha Dheri Mardan.	-do-
6.	Naheed Begum MSc BEI PET. GGMS, Shergarhi.	08.05.94.	GGHS, Kalabat, Swabi.	-do-
7.	Zahida Nageen BSc BEI P.E.T. GGHS, Panj Pir.	27.06.94.	GGHS, Dobian, Swabi.	-do-
8.	Jaheeda BSc BEI CT GGMS, Garhi Ismailzai.	08.05.94.	GGHS, Maini, Swabi.	-do-
9.	Mahira Begum BSc BEI PET GGHS, Zaida, Swabi.	08.05.94.	GGHS, Bam Khel, Swabi.	-do-
10.	Yasmeen Begum BSc BEI CT GGHS, Hoti, Mardan.	08.05.94.	GGHS, Ismaila, Swabi.	-do-

TERMS & CONDITIONS.

1. They will be governed by such rules and regulation as may be prescribed by the Govt: from time to time for the category of the Govt: Servant to which they belong.
2. Their service will be liable to termination on one month notice for either side. In case of resignation, without notice one month pay will be forfeited in full thereoff.
3. They should join the posts within one month of the issue of this Notification.
4. Their inter-se-seniority will be determined in accordance with the merit of Departmental Selection Committee.
5. Charge report should be submitted to all concerned.
6. They shall be on probation for a period of two years.
7. Their original certificates/Degrees should be checked and verified from the concerned University immediately.
8. Service Books of the teachers must be checked before handing over charge.
9. The declaration of Assets should be obtained from them immediately and placed on record.
10. Complete information on the prescribed proforma attached alongwith charge report be submitted to this Directorate within a week positively.
11. No WA/DA is allowed.
12. They are required to produce Health & Age Certificates from the Medical Authorities concerned before taking over charge.

*Attest*  
*[Signature]*

( SYED ABU SAED BACHA )  
Director of Secondary Education,  
N.W.F.P., Peshawar.

( 2-3- )

Enlist:No. 227-280 /A-167/SER/Apptt:Female. Dated Peshawar the 25.3 /1990.

Copy forwarded for information to the:-

- 1- Director Primary Education N.F.I. Peshawar.
- 2- Divisional Directors of Education (Schools) Peshawar and Mardan.
- 3- District Accounts Officers concerned.
- 4- District Edu:Officers (Female) Secondary/Primary concerned.
- 5- Principals/Headmistress concerned.
- 6- Officials concerned.
- 7- P/S to Secretary to Govt:of N.F.I., Education Deptt:Peshawar.
- 8- P/A to Director of Secondary Education N.F.I., Peshawar.

*Aziz Khan*  
 Deputy Director (Secondary),  
 For/Director of Secy:Education,  
 N.F.I., Peshawar.

~~SECRET~~ / Farhad

*Attest*  
*[Signature]*



(REGULATION WING)

Dated Peshawar, the 26<sup>th</sup> January, 2008.

**NOTIFICATION**

NO.FD/SO(FR)10-22/2007. In supercession of this Department's letter No.SO(FR)10-22(B)/2005 dated 01-10-2007 and in pursuance of the decisions of the meeting held under the Chairmanship of Secretary Establishment on 2-1-2008, the Competent Authority is pleased to allow upgradation for the incumbents of the posts as per details given below w.e.f. 1-10-2007:-

S.NO	Existing Designation and Pay Scale	Qualification	Upgraded Scale
1	Primary School Teacher (PST) (BPS-07).	FA/FSc and are trained teachers	BPS-09 (one time only)
2	Primary School Teacher (PST) with requisite experience renamed as Head Teacher/Head Mistress of Primary Schools (BPS-07).	Having 10 years service	BPS-12 (one time only)
3	CT (BPS-09).	BA/BSc and are trained teachers	BPS-15 (one time only)
4	SETs (BPS-16)	With at least ten years service. Upgradation to the post shall be made through DPC as per laid down procedure.	BPS-17
5	Qari/Qaria (BPS-07)	Hafiz Quran with SSC	BPS-12

SECRETARY TO GOVT. OF NWFP  
FINANCE DEPARTMENT

**Endst No. & Date even.**

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

- 1) All the Secretaries in NWFP, Peshawar.
- 2) All the DCOs/EDOs Schools & Literacy Department, NWFP.
- 3) Accountant General, NWFP, Peshawar.
- 4) Director Schools & Literacy NWFP, Peshawar.
- 5) Director of Education FATA NWFP, Peshawar.
- 6) PSO to Chief Minister, NWFP.
- 7) PSO to Chief Secretary, NWFP.
- 8) PS to Secretary Finance Department, NWFP.
- 9) All District/Agency Accounts Officers in NWFP.

*Naib Khan*  
(NAIB KHAN)  
SECTION OFFICER (FR)

*Attached  
4/2/08*

GOVT. OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT

D-1  
18

(REGULATION WING)

NO. SO(FR)/FD/10-22(B)/2007/Vol-II  
Dated Peshawar, the 14-10-2010

To

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

Subject: - NOTIFICATION.


Dear Sir,

I am directed to refer to this department Notification bearing No. FD/SO(FR)10-22/2007 dated 01-10-2007 and in the pursuance of Khyber Pakhtunkhwa Service Tribunal decision, the competent authority has been pleased to upgrade 2804 posts of SETs from BPS-16 to BPS-17 as personal, with effect from 01-10-2007 subject to the condition that the posts shall automatically be downgraded as and when vacated by the incumbent under the following break-up:-

Sr. NO.	POSTS	TOTAL NO. OF POSTS
1.	SETs (Male)	2333
2.	SETs (Female)	446
3.	SETs (Technical)	25
TOTAL:-		2804


2 Audit copies may be prepared and sent to this department for authentication.

Yours faithfully,

  
(SHAUKAT ULLAH)  
SECTION OFFICER (FR)

ENDST: NO & DATE EVEN.

Copy forwarded to Budget Officer-V, Finance Department for information please.

  
SECTION OFFICER (FR)

DIARY No;...186  
Date.....6/19  
E & SE, Govt; of NWFP.

To The Secretary to the Govt: of Khyber Pakhtunkhwa,  
Elementary & Secondary Education, Peshawar.

Subject: APPLICATION FOR THE GRANT OF PROMOTION AS HEAD MISTRESS IN  
BPS-17 ON REGULAR BASIS.

Sir,

The applicant respectfully submits as under:-

1. That the applicant had joined the education department as trained PST on 11-3-1978.
2. That the applicant was selected as S.E.T in BPS-16 on 25-3-1996. At the time of her selection as S.E.T, the applicant had the qualification of MA in Urdu & B.Ed.
3. That since her appointment as S.E.T, the applicant has been working as Head Mistress of the middle school.
4. That the applicant was upgraded in BPS-17 on 01-10-2007. So far the applicant has completed about five years regular service in BPS-17. Therefore, the applicant is not only fit for promotion as Head Mistress of the high school but also eligible for regular promotion in BPS-18 under the rules & the policies in vogue.
5. That the applicant also qualified M.Ed: in 2003.
6. That recently many S.E.Ts have been promoted in BPS-17 on regular basis as head mistresses of different schools but most of them have forgone their promotion due to their postings at far-flung areas. Therefore, the posts remain vacant. So the applicant offers her service for posting against one of the vacancies on the basis of her qualification and long rich experience.
7. That the applicant has teaching as well as administrative experience since 11-03-1978 till date.
8. That the rules and policies are also in favour of the applicant for her promotion on regular basis to BPS-17 as well as BPS-18.
9. That the applicant, if she is granted promotion on regular basis, is ready to go anywhere in the province in any high school as its head mistress.

It is humbly prayed that the applicant may kindly be granted promotion on regular basis as a Head Mistress of the High School in BPS-17 in the light of the above context.

Date: 26/06/2012

*Attestation*  
*1/2*

*sd/*  
Mst: Farzana Bano  
D/O Ghulam Hussain  
S.E.T  
Head Mistress  
Govt: Girls Middle School,  
New Jehangir Pura, Peshawar.

Copy of above forwarded for information and necessary action to:

1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. The Executive District Officer, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.



To

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20

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar.
2. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. The Executive District Officer, Elementary & Secondary Education, Peshawar.

Subject: APPLICATION FOR GRANT OF REGULAR PROMOTION AS A HEAD MISTRESS IN BPS-17 AND FURTHER PROMOTION IN BPS-18 ON THE BASIS OF HIGHER QUALIFICATION UNDER THE RULES, 2012.

R/Sir,

The applicant respectfully submits are as under:-

- i. That the applicant had joined the service as a PST teacher on 11.03.1978 in the Education Department.
- ii. That the applicant was selected as an SET (BPS-16) on 25.03.1996 and she joined the new post on 01.04.1996.
- iii. That the applicant was upgraded in BPS-17 on 01.10.2007.
- iv. That the applicant possesses master degrees in Urdu and Education (MA, M.Ed:).
- v. That under the existing Rules 2012, the applicant is entitled to be promoted regularly as a Head Mistress in BPS-17.
- vi. That the applicant has rendered more than 16-years service as SET, out of which she has served in BPS-17 for five years. Therefore, the applicant is also entitled for further promotion in BPS-18 under the Rules.
- vii. That the applicant had already requested on the subject noted above but to no response till date.

It is humbly prayed that the applicant may kindly be promoted as a Head Mistress in BPS-17 on the basis of her lengthy service of more than 34 years and the higher qualification of MA, M.Ed. and the case of her further promotion to BPS-18 may also be processed so that the applicant may achieve her legal rights under the prevailing rules/policy.

Thanks.

Yours obediently,

Dated 14.12.2012  
D.A: copies of MA & M.Ed Degrees.

*Attestation*  
*Josh*

*w/c* *sdl*  
(MST. FARZANA BANO)  
(SET BPS-17) D/O Ghulam Hussain  
Head Mistress, Govt. Girls Middle School,  
New Jehangir Pura, Peshawar.

Copy of the is forwarded for information to the District Officer (Female) Elementary & Secondary Education, Peshawar.

(MST. FARZANA BANO)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar the 26-02-2013

NOTIFICATION

No. SO(PE)/2-6/DPC Meeting (26-12-2012). On the recommendations of the Departmental Promotion Committee, the Competent Authority is pleased to promote the following female SETs (BS-16) to the post of Head Mistresses (BS-17) on regular basis with immediate effect :-

S#	Name	Present Addressess	Proposed place of Posting	Remarks
1	Naz Perveen	SET GGMS Qaid Abad Peshawar	H/M B-17 GGHS Nahaqi Gul Abad Charsadda	A.V.P
2	Mehmooda Yasmeen D/O Haji Ihsanullah	SET GGHS No.1 Kohat City Now HM GGHS Kachai Hassan Khel Kohat.	H/M B-17 GGHS Dhand Bakhlawara Kohat	A.V.P
3	Hussan Afroz D/O Akhtar Ali	SET GGMS Kala Khel Masti Khan Bannu	HM B-17 GGHS No.2 Bannu	A.V.P
4	Kaniz Fatima D/O Syed Malin Shah	SET GGMS Chashma Mita Khan Kohat.	H/M B-17 GGHS Ustarzai Payan Kohat	Vice S.No.100
5	Imtiaz Bibi D/O Muhammad Sadiq	SET GGHS Baghra Haripur	H/M B-17 GGHS Kohala Bala Haripur	A.V.P
6	Naseem Jan Abbasi D/O Muhammad Amir Khan.	SET GGCHSS Abbottabad	H/M B-17 GGHS Bakot A/Abad	A.V.P
7	Tehisa Begum D/O Shabir Rehman	SET GGHS Ziarat Talash Dir. (L)	H/M B-17 GGHS Sado Dir Lower	A.V.P
8	Imtiaz Perveen D/O Noor-ul Basar	SET GGHS Nowshera Cant.	H/M B-17 Khwesngi Payan Nowshera	A.V.P
9	Gul Naz Bibi D/O Muhammad Sadiq	SET GGHS Bandi Muneem Haripur	H/M B-17 GGHS Tofkian Haripur	A.V.P
10	Rushda Habib D/O Habib-ur-Renman	SET GGHS Chamba Palind Haripur.	H/M B-17 GGHS Jabbori Mansehra	A.V.P
11	Mehnaz Bibi D/O Wali Ahmad	ADO(Insp)Malakand at Bakhela	H/M B-17 GGHS Totakan Malakand	A.V.P
12	Mst.Inayat Begum D/O Sner Afzal	SET GGMS, Jalala Malakand	H/M B-17 GGHS Garhi Usmani Khel Malakand	A.V.P
13	Tanira Bibi D/O Zigrwar Said	SET GGHS Koper Malakand	H/M B-17 GGHS Qadar Kali Malakand	A.V.P
14	Miraj Bibi D/O Fazali Mahbood	SET GGHS Kabal, Swat	H/M B-17 GGHS Sarsinai Swat	A.V.P
15	Taj Mahal D/O Fazale Ghani	ADO(F)Primary Bakhela	H/M B-17 GGHS Palonow Malakand	A.V.P
16	Samina Dilawar D/O Dilawar Khan	SET GGHS Sarai Saleh Haripur	H/M B-17 GGHS Katenjar Haripur	A.V.P
17	Bibi Kibriya D/O Ghulam Nabi	SET GGMS Kuju Chitral	H/M B-17 GGHS Mastuj Chitral	A.V.P
18	Syeda Farrah Bokhari	SET GGMS Halim Sher Killy Mohmand Agency	Services placed at the disposal of Director Education FATA.	As substitute of Mst. Rashida Begum SS(Chem) posted as headmistress GGHS Malakana Nawagai Bajawar Agency for whom FATA Sectt has issued NOC vide No.FS/SSD/SO(E)6884 Dated 9-10-2012
19	Sorkar Gul	SET GGMS Malak pura Abbottabad	H/M B-17 GGHS Salhad A/Abad	Vice S.NO.102
20	Sadaqat Begum D/O Abdus Salam	SET GGHS Hayatabad Peshawar.	H/M B-17 GGHS Malik Sher Badaber Peshawar.	A.V.P
21	Saira Parveen D/O Malloob Khan	SET GGHS Sajkot A.Abad	H/M B-17 GGHS Sawan mera Mansehra	A.V.P
22	Illat Batool D/O Muhammad Nazir	SET GGMS No.1 D.I.Khan.	H/M B-17 GGHS Alog Di.Khan.	A.V.P

*Handwritten signature*

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23	Sanjeeta Ruby D/O Farooq Shah	SET GGCMHS Kohat.	H/M B-17 GGHS Keri Sheikhan Kohat	A.V.P
24	Adeeba Razaq D/O Abdur Razaq	SET GGHS Salhad A.Abad.	H/M B-17 GGHS Danda Kholian Mansehra	A.V.P
25	Saeeda Khanum D/O Sh.Khalid Salim	SET GGMS Haldi Mandi Bannu.	H/M B-17 GGHS Akhundani Mama Khel Bannu	A.V.P
26	Sabira Hussain D/O Amir Hussain Khan	SET GGCMHSS Saidu Sharif Swat	H/M B-17 GGHS Gagdarah Swat	A.V.P
27	Afia Sultana D/O Khuda Bakhsh Baloch	SET GGHS No.4 D.I Khan	I/C Vice Principal B-18 GGHS NO..2 D I Khan (in her own pay and BPS.	A.V.P
28	Rubina Shaheen D/O Karam Ali	SET GGMS Central Jail D.I.Khan.	H/M B-17 GGHS Ama Khel Tank	A.V.P
29	Hamida Begum D/O Tajul Malook	SET GGHS Civil Quartar Peshawar	Instructor B-17 PITE Peshawar	A.V.P
30	Shamim Akhtar D/O Sher Hassan	SET GGHS Kukar Peshawar	H/M B-17 GGHS Ambadher Charsadda	A.V.P
31	Kaisoom Bano Akhtar D/O S.A.Muhammad	SET GGMS Hissam D.I.Khan	H/M B-17 GGHS Bachken Akhoundzai Lakki Marwat	A.V.P
32	Zakia Sultana D/O Muhammad Akram	SET GGMS Dhodial Nawansher A.Abad.	H/M B-17 GGHS Bai Bohed Mansehra	A.V.P
33	Tohida Bano D/O Rafiq Ullah	SET GGHS Dobandi Malakand	H/M B-17 GGHS Maina Malakand	A.V.P
34	Mehwish Naureen D/O M.Ayub Farooqi	SET GGHS Kachi Pand Khan D.I.Khan	H/M B-17 GGHS Nar Azad Chandu Khel Lakki Marwat	A.V.P
35	Fouzia D/O Kifayatullah	SET GGHS Utmanzai Charsadda.	H/M B-17 GGHS Zyam Charsadda	A.V.P
36	Humaira Jabeen D/O Khurshid Alam	SET GGHS Akora Khattak NSR.	H/M B-17 GGHS Inzari Nowshera	A.V.P
37	Naheed Begum D/O Rahmat Din	SET GGHS No.1 A.Abad	H/M B-17 GGHS Bhalto Bandi Mansehra	A.V.P
38	Sadia Naz D/O Muhammad Ismail	SET GGHS No.7 D.I Khan	H/M B-17 GGHS Abakhel Lakki Marwat	A.V.P
39	Shabana Asia D/O Qamer Din	SET GGHS Chah Mughal Wala D.I.Khan.	H/M B-17 GGHS Lakki Marwat	A.V.P
40	Mansoor Norin D/O Fazal Din.	SET GGHS Jogi wara Peshawar	H/M B-17 GGHS Yaqobi Swabi	A.V.P
41	Noor Jehan Begum D/O S.A.Rashid	SET GGHS Lady Griffith Peshawar.	H/M B-17 GGHS Kopar Mardan	A.V.P
42	Karwal Bahar D/O Allaah Nawaz	SET GGMS Jatta D.I.Khan	H/M B-17 GGHS Fazii Sadiq Mandew DIKhan	A.V.P
43	Fozia Iqbal D/O Malik Muhammad Iqbal	SET GGMS Kulachi Wala D.I.Khan.	H/M B-17 GGHS GGHS Mandew Khas Bannu	A.V.P
44	Robina Shaheen D/O Muhammad Bakhsh	SET GGMS Baidheri Mangal A.Abad	Instructor RITE (F) A/Abad	Vice Mst. Tassadiq Ara who is going to be retired on 14/03/2013
45	Zahira Rauf D/O Abdul Rauf	SET GGHS Chitta Bhatta Mansehra	HM B-17 GGHS Baidara Mansehra	A.V.P
46	Shagufta Naz D/O Mian Sher Akbar Khan	SET GGHS Akbar Pura Nowshera	H/M B-17 GGHS Chowki Mamraiz Nowshera	A.V.P
47	Nusrat Begum D/O Bismillah Jan	SET GGHS Dabgari Gate Peshawar	H/M B-17 GGHS Taru Jabba Nowshera	A.V.P. She will be transferred to GGHS Muhammad Zai Peshawar w.e.f 1-4-2013 newly created post.
48	Ansar Jabeen D/O Mushtaq Ahmad	SET GGMS Chapra Haripur.	H/M B-17 GGHS Pauran Mansehra	A.V.P
49	Samina Qureshi D/O Ghulam Nabi Qureshi	SET GGMS Togh Payan Kohat.	H/M B-17 GGHS Rahmat Abad Karak	A.V.P
50	Shamim Begum D/O Fazale Mula	H/M GGMS Qilla Sherdil Peshawar	H/M B-17 GGHS Jogana Peshawar	A.V.P
51	Hasina Firdos D/O Mustajob Gul	SET GGHS Kagawala Peshawar	H/M B-17 GGHS Khapa Peshawar	A.V.P
52	Shakila Roohi D/O Abdur Rauf	SET GGHS BSD Peshawar	I/C Instructor B-17 RITE (F) Rajjar Charsadda	A.V.P
53	Shakeela Bano D/O Said Rahim	SET GGHS Malakand	H/M B-17 GGHS Prangy Malakand	A.V.P
54	Syeda Iram Zia D/O Fida Hussain Shah	SET GGMS Lakhra D.I.Khan.	I/C Pripl; B-18 GGHS Belot Sharif DIKha in her own pay and BPS.	A.V.P
55	Shaheen Akhter D/O Muhammad Ayub	SET GGHS Kag Haripur	H/M B-17 GGHS Trappi Mansehra.	A.V.P

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56	Naseeb Ranara D/O Mian Qasim Jan	SET GGMS Pati Kala Mardan	H/M B-17 GGHS Alo Mardan	A.V.P
57	Tahira Shaheen D/O Gul Zaman Qureshi	SET GGMS Mohri Molia Haripur	H/M B-17 GGHS Sangow Mansehra	A.V.P
58	Tallat Farhana Jadoon D/O Muzaffar Khan Jadoon	SET GGHS Bagnotar A.Abad	H/M B-17 GGHS Kairi Raki A/Abad	A.V.P
59	Zeenat Bibi D/O Dost Muhammad	SET GGHS No.6 D.I.Khan	H/M B-17 GGHS Aslam Khan Korrona Tank	A.V.P
60	Shaheena Nasreen D/O H.Mushlaq Ahmad	SET GGHS Daraban Khurd D.I.Khan	H/M B-17 GGHS Dabbara Tank	A.V.P
61	Zahida Siddiqia D/O Haji Abdul Qadus	SET GGHS No.2 Haripur	H/M B-17 GGHS Kharia Haripur	A.V.P
62	Zeenat Ara D/O Sher Muhammad Marwat	SET GGHS No.1 Lakki	H/M B-17 GGHS Marmandi Azim Lakki Marwat	A.V.P
63	Raana Jali D/O Abdul Jali	SET GGHS Havelian A.Abad.	H/M B-17 GGHS Bandi Matraj Abbottabad	A.V.P
64	Samreen Saad D/O Sandeet-Din	SET GGMS Khru Wali D.I.Khan	H/M B-17 GGHS Tajazai Lakki Marwat	A.V.P
65	Mohsina Begum D/O S.Muhammad Sharif	SETGGHS No.2 Peshawar Cantt.	H/M B-17 GGHS Machai Mardan	A.V.P
66	Gul Bahar D/O Abdul Rasheed	SET GGHCMS Mansehra	H/M B-17 GGHS Reerh Mansehra	A.V.P
67	Zahida Ayaz D/O Muhammad Ayaz	SET GGHS Ziarat Talash Dir(L)	H/M B-17 GGHS Khazana Dir Lower	A.V.P
68	Nayyar Sultana D/O M. Baknsh	SET GGHS No.9 Dinpur D.I.Khan.	H/M B-17 GGHS Pai Tank	A.V.P
69	Sherin D/O Muhammad Jalal	SET GGHS Rajjar Charsadda	H/M B-17 GGHS Bobak Charsadda	A.V.P
70	Naeem Fatima D/O Ghulam Sadig	SET GGCMHS No.1 D.I.Khan.	H/M B-17 GGHS Adhami Sultan Ali Bannu	A.V.P
71	Uffat Begum D/O Rahat Ullah Khan	SET GGHS No.2 Kohat.	H/M B-17 GGHS Meta Khel Karak	A.V.P
72	Sajida Parveen D/O Fazalur Rehman	GGCMS No.1 Haripur.	HM B-17 GGHS Beer Haripur.	A.V.P
73	Yasmeen Begum D/O Shamsul Qamar	SET GGHS Mayar Mardan	H/M B-17 GGHS Chargulai Mardan	A.V.P
74	Huma Kalsoom D/O Abdullah Khan	SET GGHS Ghazni Khel Lakki	H/M B-17 GGHS Ghazni Khel Lakki Marwat	vice S.No.101
75	Zuhra Bano D/O Abu Saeed Farooqi	SET GGHS Matta Swat	I/C Pript; B-18 GGHS Matta Swat	A.V.P
76	Bibi Nagina D/O Abdur Rauf	SET GGHS Ghari Habibullah Mansehra	H/M B-17 GGHS Kawai Mansehra	A.V.P
77	Farzana Nawaz SET D/O Muhammad Nawaz	SET GGHS Bandi Maira Abbottabad	H/M B-17 GGHS Kaghan Mansehra	A.V.P
78	Farzana Shaheen D/O Fida Hussain	SET GGHS Gulshan Rehman Colony Pehawar.	H/M B-17 GGHS Kohi Barmol Mardan	A.V.P. She will be transferred to GGHS Warsak Colony Peshawar on 11-4-2013 on retirement of Ms.Nasira Parveen
79	Sajida Nasreen D/O Muhammad Rashid	SET GGHS No.1 Mansehra.	H/M B-17 GGHS Berkund Mansehra	A.V.P
80	Bibi Safia D/O Hamayun Khan	SET GGHS Baffa Mansehra	I/C Vice-Principal B-18 GGHS Abbottabad	A.V.P
81	Samia Jabeen D/O Ashiq Muhammad	SET GGHS, Hassa Shumali D.I.Khan	H/M B-17 GGHS Muhammad Ali Madi Khel Bannu	A.V.P
82	Samia Bano D/O Habib-ur- Rehman	SET GGMS Kotly Pain Mansehra.	HM B-17 GGHS Daryal Mansehra	A.V.P
83	Rahat Begum D/O Syed Badshah	SET GGHS BSD Peshawar	Instructor RITE Female Rajjar Charsadda	A.V.P.
84	Zohra Khatoon D/O Ali Hussain	SET GGCHSS A.Abad	H/M B-17 GGHS Bandi Pullan A/Abad	A.V.P.
85	Zahida Perveen D/O Rahim Bakhsh	SET Govt; Girls Comp: Higher Secondary School Peshawar	H/M B-17 GGHS Mandori Nowshera	A.V.P
86	Sabiha Yasmin D/O Karim Bakhsh.	SET GGHS Gulbahar Peshawar	H/M B-17 GGHS Palo Dheri Mardan	A.V.P
87	Shabana Tabassum D/O Abdul Rashid	SET GGHS Jogiwara Peshawar	H/M B-17 GGHS Mian Khan Mardan	A.V.P
88	Israr Begum D/O Tajamul Hussain	SET GGHS Irrigation Colony Peshawar	H/M B-17 GGHS Shekho Sardheri Charsadda	A.V.P

Altaf  
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89	Gul Fareen D/O Khurshid Ali Khan	SET GGMS Wattar Nowshera	H/M B-17 GGHS Kotli Kallan Nowshera	A.V.P
90	Anjum Parveen D/O Zarindad Khattak	SET GGMS Achini Payan Peshawar	H/M B-17 GGHS Ikrampur Mardan	A.V.P
91	Samina Siddique D/O Muhammad Sadique	SET GGHS Arra D.I.Khan.	H/M B-17 GGHS Bangish Khel Bannu	A.V.P
92	Farhat Begum D/O Sharif Gul	SET GGHS Nowshera Kalan	H/M B-17 GGHS Spin Khak Nowshera	A.V.P
93	Ikumida Bano D/O Ali Gohar	SET GGHS Pori Holi Mardan	H/M B-17 GGHS Khazana Dheri Mardan	A.V.P
94	Musarat Nazir D/O M.Zahoor Khan	SET GGHS Sulaiman Khel Peshawar.	H/M B-17 GGHS Garhi Daulat Zai Mardan	A.V.P
95	Nazima Norin D/O Muhammad Yousaf.	SET GGMS Kokal Barseen A. Abad	H/M B-17 GGHS Battagram	A.V.P
96	Zubaida Roohi D/O Imdad Din	SET GGMS Sultan Pur A.Abad	H/M B-17 GGHS Banian Battagram	A.V.P
97	Khairun Nisa Hashmi D/O Raheem Shah Hashmi	SET GGHS No.4 Basti Ustarana North D.I.Khan	H/M B-17 GGHS Shamshi Khel Bannu	A.V.P
98	Noor-us-Sabah D/O Zahoor Ahmad	SET GGHS ASC Centre-NSR	H/M B-17 GGHS Pir Sabaq Nowshera	A.V.P
99	Nasreen D/O Saifdar Khan	SET GGHS Lund Khwar Mardan	H/M B-17 GGHS Sher Garh Mardan	A.V.P

## CONSEQUENTIAL POSTING / TRANSFER

100	Farhat Jan	H/M B-17 GGHS Ustarzai Payan Kohat	H/M GGHS Alizai Kohat	A.V.P
101	Husna	SS (pak-study) working as H/M B-17 GGHS Ghazni Khel	SS (Pak study) B-17 GGHS Kotli Sadat Bannu	A.V.P
102	Hamida Bibi	H/M B-17 GGHS Salhad A/Abad.	H/M B-17 GGHS Berot A/Abad	A.V.P
103	Saida Begum	H/M B-17 GGHS Kandary Mardan.	H/M B-17 GGHS Haji Zafar Ali Koroona Qudrat Kally (Umar Abad) Mardan.	Against newly sanctioned post
104	Rashida Begum	H/M B-17 GGHS Malakana B.Agency	SS (Chemistry) GGHS Harichand (Charsadda)	Against her original post.

2. On their promotion, the Head Mistresses concerned will be on probation for a period of one year in terms of Section 6(2) of NWFP Civil Servant Act, 1973 read with Rule 15(1) of the NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.

3. No TA / DA allowed.

SECRETARY

Endst. No. & date as above.

1. The Additional Chief Secretary (FATA), FATA Secretariat Warsak Road Peshawar.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
4. The Accountant General Khyber Pakhtunkhwa, Peshawar.
5. PSO to Chief Secretary to Govt. of Khyber Pakhtunkhwa.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education FATA, Warsak Road, Peshawar.
8. The Director Curriculum & Teachers Education, Abbotabad.
9. The Director ESRU, Khyber Pakhtunkhwa.
10. The District Education Officers, Elementary & Secondary Education concerned.
11. The District Accounts Officers concerned.
12. PS to Secretary E&SE Department.
13. Headmistress/SS concerned.
14. Office File.

*Alena*

SECTION OFFICER PRIMARY

To

The Chief Secretary to the Government of Khyber Pakhtunkhwa,  
Peshawar.

Subject:

**DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 26.02.2013, ISSUED BY THE SECRETARY OF GOVERNMENT K.P.K, ELEMENTARY & SECONDARY EDUCATION DEPARTMENT, THROUGH WHICH 99 S.E.Ts HAVE BEEN PROMOTED AS HEADMISTRESSES(BPS-17) ON REGULAR BASIS BUT THE APPELLANT HAS BEEN UNLAWFULLY IGNORED.**

Sir,

The Appellant respectfully submits as under:-

1. That the Appellant had joined the Education Department as a trained PST teacher on 11.03.1978.
2. That the Appellant was selected and appointed as S.E.T (BPS-16) vide order dated 25.03.1996.
3. That under a similar order dated 25.03.1996, one Naz Perveen was also selected and appointed as SET in (BPS-16) ( copies of both the orders are annexed at A&B).
4. That Appellant and other S.E.Ts including Naz Perveen were upgraded in BPS-17 w.e.f. 01.10.2007.
5. That the Appellant submitted applications for the grant of promotion as Headmistress to the competent authority on 26.06.2012 and 14.12.2012 but to no response (copies of the applications are annexed as C&D).
6. That the Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department has issued the Impugned Order dated 26.02.2013, whereby 99 S.E.Ts including Mst: Naz Peraveen, have been regularly promoted as headmistresses but the Appellant has been deprived of her promotion (copy of the Impugned Order annexed as E).
7. That the Appellant is badly shocked, therefore, she has no other option but to file this Appeal before your goodself for the redress of her grievance on the following grounds:-
  - a) That the Impugned Order dated 26.02.2013 is unlawful, void, arbitrary, malafide, illegal and as such without lawful authority.
  - b) That the Impugned Order has no legal footing. The valid and lawful orders are always based on legal and valid seniority list. But in this case no proper and lawful seniority list has been maintained for issuing the promotion order. So Impugned Order dated 26.02.2013 is the product of discretion.
  - c) That the teacher appearing at S No. 01 (Naz Parveen), of Impugned Order and the Appellant both were selected and appointed as S.E.Ts on the same date ie 25.03.1996. Therefore, awarding her and discarding the Appellant is the worst example of discrimination.

*Attestation*  
2/2/13


- d) That Naz Parveen had joined the service as C.T on 05.01.1985, while the Appellant entered the service as PST on 11.03.1978. Therefore, the appellant has rendered much more service than Naz Parveen. So depriving Appellant of her due right is an act of injustice.
- e) That the service of the Appellant right from 11.03.1978 till date is continuous. So far the Appellant has rendered 35 years service with good record. Unfortunately the department ignored all these facts and figures and deprived the Appellant of her right.
- f) That even in the academic and professional fields of education the Appellant is much more qualified than the promotee appearing at S No.1, of the Impugned Order. The Appellant possesses the qualification of M.A, M.Ed, while Naz Parveen is B.A B.Ed.
- g) That the Appellant is also entitled to be promoted as Headmistress (BPS-17) on regular basis from the same date ie 26.02.2013.
- h) That under the circumstance the Impugned Order dated 26.02.2013 is liable to be cancelled or modified.

It is humbly prayed that accepting this departmental appeal, the Appellant may kindly be promoted on regular basis as headmistress (BPS-17) from the same date ie 26.02.2013.

N.B. An early action in this regard with intimation to the Appellant shall be highly appreciated.

Dated 11.03.2013

Yours Obediently

  
Mst: Farzana Bano (S.E.T)  
D/O

**Ghulam Hussain**  
Headmistress  
G.G.M.S. New Jehangir Pura,  
Wazir Bagh Road Peshawar.

*Attested*  


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

1. The Secretary to Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Finance Department Peshawar, Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department, Peshawar.
4. The Director, Elementary & Secondary Education, KPK Peshawar.
5. The District Education Officer (Female) Peshawar.

Mst: Farzana Bano (S.E.T)

Registered

Directorate of Elementary & Secondary  
Education Khyber Pakhtunkhwa Peshawar

No. 797 File No. A-88/S.List B-16/  
B-17 (M&F)

Dated Peshawar the 5/4/ 2013.

To.

Mst: Farzana Bano,  
SET(F)/Head Mistress,  
GGMS New Jehangir Pura,  
Wazir Bagh Road Peshawar.

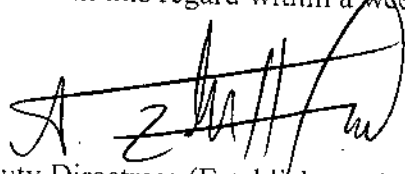
Subject:-

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED  
26.02.2013, ISSUED BY THE SECRETARY OF GOVERNMENT, K.P.K  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
THROUGH WHICH 99 S.E.Ts HAVE BEEN PROMOTED AS  
HEADMISTRESS (BPS-17) ON REGULAR BASIS BUT THE  
APPELLANT HAS BEEN UNLAWFULLY IGNORED.

I am directed to refer to your appeal on the captioned subject and it is re-iterated to  
state that :-

1. Your appeal against the promotion of Headmistress is totally baseless as Naz Parveen was appointed as SET on 02.04.1990 on fixed pay (Annexure-A) and then she went to court and court allowed her Graded pay w.e.f. 02.04.1990(Annexure-B) and department also issued notification of graded pay Annexure-C).
2. The Government of Khyber Pakhtunkhwa allowed seniority to all graded pay holder SETs (Annexure-D) and thus she was also awarded seniority w.e.f. the date of her passing /B.Ed and graded pay (i.e 02.04.1990) and resultantly she was promoted to Headmistress post of B-17 (Regular) purely on merit and according to rules/policy/seniority.
3. Your above baseless appeal has been seriously viewed by the competent authority particularly making direct correspondence with the high ups (Chief Secretary) and decided to call your Explanation.

Hence you are directed to explain your position in this regard within a week time.



Deputy Directress (Establishment)  
E&SE Khyber Pakhtunkhwa, Peshawar

Endst: No. \_\_\_\_\_

Copy forwarded for information to the:-

1. District Education Officer (F) Peshawar with the direction to follow up of the case and send her report immediately.
2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar



Deputy Directress (Establishment)  
E&SE Khyber Pakhtunkhwa, Peshawar



APPOINTMENT/ADJUSTMENT

Annex - A

28<sup>th</sup>

(4)

Consequent upon her approval by the selection committee, Mrs. Naz Farooq B.A. B.Ed. on s/v post at Government Girls Middle School Kari Ghar Unari Tehsil Mera (Khyber Agency) is temporarily appointed/adjusted against the vacant B.T. post at Government Girls Middle School Gwand Khan Killa (P.W. Peshawar) S.No. 1165/- P.W. fixed on her own pay and BPS which ever is beneficial to her with effect from the date of her taking over charge vice Sahida Begum J.I. transferred against the post of Assistant Agency Education Officer (Khyber Agency).

Notes:-

- 1) TA/DA etc. is not allowed.
- 2) Charge report should be submitted to all concerned in duplicate.
- 3) If she failed to report her arrival for duty within 15 days, report to this effect should be sent to this Directorate, at once.
- 4) Her appointment against the B.T. post is being made purely on temporarily basis and liable to reversion at any time without any notice or assigning any reason.

DIRECTOR OF EDUCATION  
PATA, NWFP, PESHAWAR.

Order No. 14772-74

Dated Peshawar the 2/6/70

Copy forwarded for information and necessary action to the :-

- 1) Agency Education Officer Khyber Agency & P.W. Peshawar with reference to his Order No. Nil, dated 15-5-70, forwarding the application of the above named mistress.
- 2) PA to Director of Education (P.W.), NWFP, Peshawar.
- 3) Personal file.
- 4) General file.

*[Signature]*  
Deputy Director of Education  
PATA, NWFP, Peshawar. 2/4

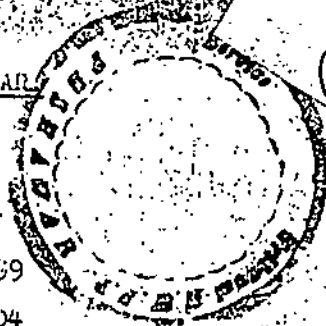
(w/ndod)

*Noted*  
*2/7/70*

BEFORE THE NWFP SERVICE TRIBUNAL PESHAWAR

*Annex B*

12/29



Appeal No. 316/1999

Date of institution - 22.2.1999

Date of decision - 14.5.2004

Mst. Naz Parveen BPT, GGMS,  
Jehangir Pura Peshawar.

(APPELLANT)

VERSUS

1. Secretary Education NWFP Peshawar.
2. Director Secondary Education NWFP, Peshawar.
3. Director of Education (PATA) NWFP, Peshawar.
4. D.O. (P) Secondary Peshawar. . . . . (RESPONDENTS)

Mr. Saddicullah Laid Advocate.  
Mr. Mulfizar Ali Govt. Pleader.

..For appellant.  
..For respondents.

MR. SAHIB JAN  
MR. MUHAMMAD BRAUKAR

..MEMBER.  
..MEMBER.

JUDGMENT

MR. SAHIB JAN, MEMBER:- This appeal has been filed by the appellant for the award of graded pay of BPT post from the date of her appointment i.e. 2.4.1990.

Brief facts of the case as averred in the memo of appeal are that the appellant was appointed as BPT on fixed pay in HPS-15 at Samad Khan Kot F.R. Peshawar, as ordered dated 2.4.1990. However, the appellant is working in HPS as BPT at GGMS Jehangir Pura Peshawar. The appellant has passed B.A. Examination on 13.7.1985 and also passed B.Ed. Examination in 1989. The appellant was awarded graded pay with regularization of service w.e.f. 25.3.1996 instead of 2.4.1990. The appellant submitted a departmental appeal for the grant of graded pay w.e.f. 2.4.1990 but no response has been received.

ATTESTED

*Attested*

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within the statutory period of 90 days.

3. The appellant has assailed the impugned denial on the grounds that the appellant was fully qualified from the date of appointment. Respondent No. 2 regularized her service and awarded graded pay w.e.f. 25.3.1996 instead of 2.4.1990, i.e. the date of her appointment. The case of appellant is also identical to the cases of Gulam Khan Bhat and Iqbal Begum who have been awarded graded pay from the date of their working as per the order of this Tribunal.

4. The respondents have filed their reply, contested the appeal and denied the claim of the appellant. Arguments of the learned counsel for the parties have been heard and record perused.

5. The learned counsel for the appellant argued that the appellant joined the Education Department as SV Teacher on 2.4.1985. Later on, on 2.4.1990 the appellant was appointed as SET Teacher against the vacant post of SET on fixed pay vide her appointment order dated 2.4.1990. The appellant continued to work as SET Teacher on fixed pay till 25.3.96 when she was appointed as SET Teacher on regular basis vide appointment order dated 25.3.1996. The learned counsel for the appellant submitted that the appellant has passed her B.Ed in the year 1989 well before her appointment as SET on fixed pay on 2.4.1990 and as such she was entitled for the graded pay w.e.f. 2.4.1990 instead of 25.3.1996. The learned counsel contended that a number of SET Teachers who were appointed as SET Teachers on fixed pay have been given graded pay of the post of SET from the date of their professional qualification of B.Ed while the appellant has been discriminated. The learned counsel urged that the appellant may be allowed graded pay w.e.f. 2.4.1990 as she was professionally qualified for the SET post on 2.4.1990.

ATTESTED

*Attested*

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The Tribunal observes that the appellant was appointed as Teacher temporarily against the vacant post of SMT on 2.4.1990 by the Director of Education, the competent authority. She was professionally qualified for the post of SMT at the time of her temporary appointment as SMT as she had passed her B.Ed in the year 1989. She had been serving/ discharging her duties as SMT Teacher against the post held by her continuously till her appointment as SMT on regular basis. As she was professionally qualified on 2.4.90 she was entitled to the running pay w.e.f. 2.4.1990 as argued by the learned counsel for the appellant and as already held by the Service Tribunal and Hon'ble Supreme Court of Pakistan vide PLJ-1994-(0.3)S.C.411.

7. In view of the above discussion, the appeal of the appellant is accepted and she is held to be entitled to the graded pay and increments of the SMT post w.e.f. 2.4.1990, with no order as to costs. File be consigned to the record.

MINUTES OF  
14.5.2004.

*A. Saigal*  
(MR. SAHIB JAIN)  
MEMBER

*Muhammad Shaukat*  
(MUHAMMAD SHAUKAT)  
MEMBER.

Certified to be true copy  
EsAMEER,  
Supp Service Tribunal  
Peshawar.

Date of Presentation of Applicant... 2-12-04  
Number of Words... 1200  
Copping Fee... 8-00  
Urgent... 2-00  
Total... 10-00  
Name of Copyist...  
Date of Completion of Copy... 2-12-04  
Date of Delivery of Copy... 2-12-04

*Attested*  
*2/12/04*

Annex - C

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32

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

NOTIFICATION

In supersession of Notification issued under Ends: No.1962-64/A-24 / SET(Female)/G.Casses/05, dated 19/5/2006 and in pursuance of the judgment of Service Tribunal, NWFP, Peshawar dated 14/5/2004 in appeal No 316/1999, Mrs. Naz Parveen, SET Govt. Girls Middle School New Jehangir Pura Peshawar, is hereby allowed graded pay of SET as under:

<u>With Effect From</u>	<u>B.P.S</u>
2/4/1990 to 31/5/1991.	BPS-15
01/6/1991	BPS-16

Necessary entry to this effect should be made in her relevant record.

Director Schools & Literacy  
NWFP, Peshawar

Endst No. 25-54 /F.No.5/A-17/SET(F)/G.Casses/2005  
Dated. 4/7 /2007

Copy forwarded for information & necessary action to the :-

1. Executive District Officer (S&L) Peshawar.
2. District Account Officer, Peshawar.
3. Mrs. Naz Parveen, SET, GGMS Jehangir Pura Peshawar..
4. PA to Director S&L, NWFP.

*Attested*  
*[Signature]*

*[Signature]*  
Deputy Director (Es tb)  
Directorate of Schools & Literacy  
N.W.F.P., Peshawar



33

19/2/09

*Annot-D*

**GOVERNMENT OF NWFP  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT**

No. SO (PE)2-6/DPC/09,  
Dated Peshawar, the 12.6.2009

To:

The Director  
Elementary & Secondary Education  
NWFP Peshawar

Subject:- REGULARIZATION/SENIORITY OF SETs. *P.24-A*

I am directed to refer to your letter No. 3830/A-88/SET/Graded Pay/08, dated 6.11.2008 on the subject noted above and to state that although the judgment regarding Noor ul Hayat, Muhammad Ismail and Habib ur Rehman are "judgments in personam" and not "judgment in Rem" hence relief granted therein cannot be extended to others. However, as the batch wise/year wise policy of selection has been quashed with, therefore all such chronic cases of seniority and graded pay need to be decided uniformly.

2. So far as the Supreme Court of Pakistan judgment dated 6.9.2007 (in appeals No. 1081-1088 title Habib-ur-Rehman & others Vs Govt) is concerned, these appeals are allowed which means that all reliefs sought therein may be given to them. Therefore they may be given seniority/regularization from the date of passing B.Ed.Examination and Graded Pay from the date of induction as already granted to Mr. Muhammad Ismail (CP No. 898/06) which has been relied upon by Supreme Court of Pakistan in judgment dated 6.9.2007. Moreover, it is the judgment of a larger bench of seven judges including Chief Justice of Pakistan which is more authoritative in its nature and its non implementation will put the department in an awkward position in the shape of contempt of court.

3. The Director, being the appointing authority, is advised to settle the issue of seniority and graded pay of all 163 SETs by giving them seniority from the date of passing B.Ed Examination and Graded Pay from the date of induction (in the light of judgments of NWFP Service Tribunal and Supreme Court of Pakistan delivered at various times) within a month time, uniformly, under intimation to this Department.

*ADD (Gon?)  
Ateesh  
2/3/09*

*ARIF*  
(ARIF JMIL)  
SECTION OFFICER (PRIMARY)



GOVERNMENT OF N.-W.F.P.  
ESTABLISHMENT & ADMINISTRATION  
DEPARTMENT  
(ESTABLISHMENT WING)

No SOE-III (E&AD) 1-3/2008  
Dated Peshawar the 28<sup>th</sup> January, 2009

20 J  
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To

1. The Additional Chief Secretary, GoNWFP.
2. The Additional Chief Secretary (FATA), Peshawar.
3. The Senior Member, Board of Revenue, N.-W.F.P.
4. All Administrative Secretaries to Government of N.-W.F.P.
5. The Secretary to Governor, N.-W.F.P.
6. The Principal Secretary to Chief Minister, N.-W.F.P.
7. All Divisional Commissioners in NWFP.

SUBJECT:- NORTH-WEST FRONTIER PROVINCE CIVIL SERVANTS PROMOTION POLICY, 2009.

Dear Sir,

I am directed to refer to the subject noted above and to say that 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 15 :	7 years' service in BS-18
Basic Scale 20 :	10 years' service in BS-18 and above or 3 years' service in BS-19.

Chief Officer F-3  
Peshawar  
2009

Attested  
[Signature]

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
S/MC	70
N/MC	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:

*Abulhasan*  
2/2/11

Officer (E-3)  
Government Dupla  
2/2/11



GOVERNMENT OF NORTH-WEST FRONTIER  
PROVINCE.

SERVICES AND GENERAL ADMINISTRATION  
DEPARTMENT.

(REGULATION WING).

No. SOR-1 (S&GAD)1-29/75

Dated Peshawar, the 13th April, 1987.

To,

1. All Administrative Secretaries to Government of North-West Frontier Province.
2. All Divisional Commissioners in North-West Frontier Province.
3. Secretary to Governor, North-West Frontier Province.
4. All Heads of Attached Departments in North-West Frontier Province.
5. Secretary, North-West Frontier Province Public Service Commission, Peshawar.
6. All Deputy Commissioners/Political Agents in North-West Frontier Province.
7. All District and Sessions Judges in North-West Frontier Province.
8. Registrar, Peshawar High Court, Peshawar.

**Subject:—DETERMINATION OF SENIORITY OF CIVIL SERVANTS PROMOTED FROM ONE GRADE TO THE OTHER-GUIDELINES FOR DEPARTMENTAL PROMOTION COMMITTEES/PROVINCIAL SELECTION BOARD.**

Sir,

I am directed to say that under Section 9 of the North-West Frontier Province Civil Servants Act, 1973, a civil servant possessing such minimum qualifications as may be prescribed shall be eligible for promotion to a higher post for the time being reserved under the rules for departmental promotion in the service or cadre to which he belongs. A post referred to above may either be a selection post or a non-selection post to which promotion shall be made as may be prescribed:—

(a) in the case of a selection post, on the basis of selection on merit; and  
(b) in the case of a non-selection post, on the basis of seniority-cum-fitness.

2. Under rule 7 of the North-West Frontier Province Civil Servants (Appointment, Promotion and Transfer) Rules, 1975, appointment by promotion to posts in B-2 to 16 is made on the recommendations of the appropriate Departmental Promotion Committee and to posts in B-17 and above is made on the recommendations of the Provincial Selection Board and approval of the Competent Authority as given in rule 4 of the rules *ibid*.

3. The Provincial Government are pleased to direct that the Provincial Selection Board/Departmental Promotion Committees shall consider the cases of eligible civil servants with due regard to seniority in accordance with procedure prescribed in para 1 above and may either:—

- (a) recommend a Civil Servant for promotion to the next higher post; or
- (b) recommend a Civil Servant for supersession; or
- (c) defer consideration of a Civil Servant's promotion provided that this step will be taken only if:—
  - (i) The Civil Servant's *inter-se* seniority is under dispute/subjudice.
  - (ii) Disciplinary or Departmental proceedings are pending against the Civil Servant whose promotion case comes up for consideration before the Provincial Selection Board/Departmental Promotion Committee.
  - (iii) The CR dossier is incomplete or any other document/information required by the PSB/DPC for determining a Civil Servant's suitability for promotion is not available for reasons beyond the control of the person concerned.

4. If an officer who is eligible for promotion but has been inadvertently omitted from consideration in the original reference due to clerical error or plain negligence and is superseded, the case of such an officer should be considered for promotion as soon as the mistake is noticed.

*Handwritten signature/initials*

*Handwritten number 436 and initials*

5. If a Civil Servant is superseded, he shall not be considered for promotion unless he earns one more ACR for the ensuing one full year.

6. The Civil Servant whose promotion has been deferred will be considered for promotion as soon as the reason on the basis of which deferment took place ceases to exist. The cases of the Civil Servants falling under any of the three categories in sub-para 'C' of para 3 above do not warrant proforma promotion but are required to be considered for promotion after determining the correct seniority over their erstwhile juniors in the higher post.

7. If and when an officer after his seniority has been correctly determined or after he has been exonerated of the charges or his CR dossier is complete or the adverse remarks in his CRs have been expunged, or his inadvertent omission for promotion comes to notice, it is considered by the Provincial Selection Board/Departmental Promotion Committee and the Competent Authority and is declared fit for promotion to the next higher grade, 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. This proviso also applies to cases where the promotions of two or more officers are notified on the same date but the junior of these officers takes over charge earlier than his senior, particularly in cases where the senior officer is forced to take over later for reasons of distance or difficulty in the assumption of charge. This proviso read with general principles of seniority which are deemed to be rules made under Section 26 of the North-West Frontier Province Civil Servants Act, 1973, enable the left over persons to regain seniority without effecting retrospective promotion. However, in such cases, the intervening period can be counted towards increments under F. R. 26 (c) but without arrears.

8. Officers who are approved by the Provincial Selection Board/Departmental Promotion Committee and the Competent Authority for promotion to the higher grade on an earlier date shall rank senior to those who are approved on a later date except those referred to in para 7 above.

9. A Civil Servant will only be promoted within his own cadre. A Civil Servant posted out side his cadre temporarily on account of deputation on foreign service or duty abroad including Pakistan Missions abroad will be considered for promotion on his turn but if selected, the offer of promotion should be made to him and he should be asked to revert to his parent cadre/Department to take up the higher appointment. If he declines to revert, then his actual promotion will take place only when he rejoins his parent cadre. His seniority in the higher post/grade would be determined from the date he is promoted to it in due course after his reversion to the parent cadre.

10. A Civil Servant on deputation to a Forcing Government, International Agency or Private Organization abroad will be considered for promotion only on his return to Pakistan. He will be given intimation and asked to return to Pakistan before his case comes up for consideration for promotion in accordance with his seniority position; if he fails to return he will not be considered for promotion. Such an officer will have to earn at least one ACR after his return to Pakistan before he is considered for promotion. The clearance/approval already accorded in the past to promote a deputationist would lapse automatically if he fails to return on expiry of the deputation period already approved by the Government.

11. If a Civil Servant is cleared for promotion to the higher post/grade by the Competent Authority is not promoted within a period of six months or the expiry of the current calendar year, whichever is later, the clearance would lapse. The case of such a Civil Servant would require placement before Provincial Selection Board/Departmental Promotion Committee afresh.

Your Obedient Servant,  
ZARIN DAD KHATTAK,  
Additional Secretary (Regulation)

Encls. No. SOR-1 (S&GAD) 1-29/75 Dated Peshawar, the 13th April, 1987.

- Copy forwarded to:—
1. Additional Secretaries, Services and General Administration Department.
  2. All Deputy Secretaries in Services and General Administration Department.
  3. Private Secretary to Chief Secretary, North-West Frontier Province.
  4. All Section Officers in Services and General Administration Department.
  5. Private Secretary to Secretary, Services and General Administration Department.
  6. Librarian.

ATA MUHAMMAD,  
Section Officer (R-1).

G&SPD—NWFF—2065 S&GAD—500 Copies—12-4-87—(262)

*Additional*  
*2-7-1*

دستخط

# University of Peshawar

(Punjab)

Session Annual 1991

\_\_\_\_\_ of \_\_\_\_\_ and a Student  
of District Peshawar \_\_\_\_\_  
having passed the prescribed Examination  
held in April, 1992, is this day admitted by the University of Peshawar,  
to the Degree of

## Master of Arts

in the \_\_\_\_\_ Division

The Subject of Examination being \_\_\_\_\_

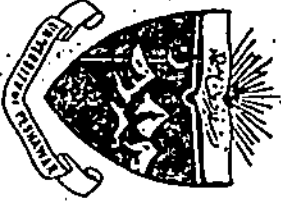
The Examination was taken as a whole / in parts

Serial No. 011765

Register No. 96-P/A-17354

Roll No. 6532

Result Declared on November 22, 1992



Richard Khan  
Registrar

Countersigned  
Director  
Director of Education

Handwritten signature and date: 12/1

K-I  
39  
No

013480

Registration No AUP (E) 1665 - 2003

Al-Khair University  
Al-Khair University  
Al-Khair University



Session 2003

This is to certify that

Farzana Bano D/O Ghulam Hussain

has obtained the Degree of

Master of Education

in this University at the Examination held in September, 2003

*President*  
2/2/05

Controller of Examinations

*[Signature]*

Chancellor

*[Signature]*

Muzaffarabad March 2, 2005

پشاور یونیورسٹی

# University of Peshawar (Pakistan)

Session ANNUAL 1986

FARZANA BANO DAUGHTER OF GHULAM HUSSAIN

of PESHAWAR DISTRICT having passed the prescribed Examination held in OCTOBER 1985 is this day admitted by the University of Peshawar to the Degree of

## Bachelor of Arts

in the SECOND Division

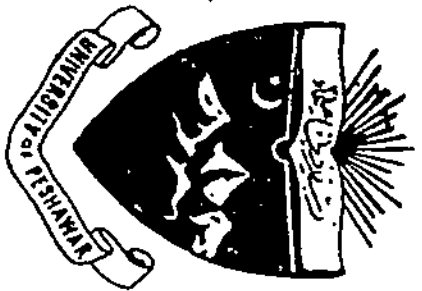
The examination was taken as a whole/in parts:

Serial No: 006375

Registered No. 86-PA-17394

Roll No 4514

Result declared on 6TH APRIL 1987



*Munir*

*Abdul Shauq*  
Registrar

Countersigned

*William*  
Vice-Chancellor



# University of Peshawar

(Pakistani)

Session ANNUAL 1991

FARZANA BANO DAUGHTER of GHAULAM HUSSAIN and a student

DISTRICT PESHAWAR having passed the prescribed examination

in DECEMBER 1991, is this day admitted by the University of Peshawar to the Degree of

## Bachelor of Education

In the SECOND Division in Theory

In the FIRST Division in Teaching Practice

In the SECOND Division in Aggregate

*[Signature]*

He/She also passed GRADUATE as additional/optional subject.

The Examination was taken satisfactorily in parts.

Serial No: 007578

*Fazli Hamid*  
Registrar

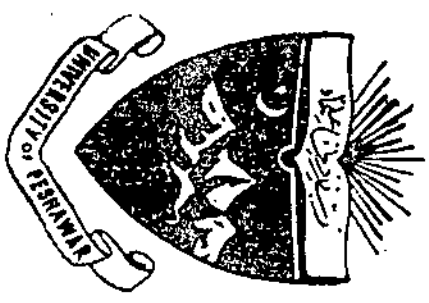
Registered No. 85-P.A-17394

Countersigned

Enrolment No. 205

Result declared on APRIL 27, 1992

*[Signature]*  
Vice-Chancellor



SN<sup>o</sup> 205841

Roll No. 15 282

**Board of Intermediate and Secondary Education**  
**PESHAWAR, N.W.F.P. (PAKISTAN)**



*Mustafa*  
*1/1/76*

**Secondary School Certificate Examination**  
**SESSION 1976 (ANNUAL)**

This is to certify that Farzana Bano  
Son/Daughter of Ghulam Hussain  
and a student of Begum Shahabud Din Girls High School, Peshawar.  
has passed the **SECONDARY SCHOOL CERTIFICATE EXAMINATION** of  
the Board of Intermediate and Secondary Education, Peshawar held in March/April, 1976  
as a regular candidate. He/She obtained 500 Marks out of 900/1000,  
and has been placed in Grade  representing (Good).

The candidate passed in the following Subjects :

- |              |                                       |                        |
|--------------|---------------------------------------|------------------------|
| 1. English   | 4. <u>Pakistan Studies</u>            | 7. House-hold Accounts |
| 2. Urdu      | 5. <u>General Science</u>             | 8. Islamic Studies.    |
| 3. Islamiyat | 6. <u>Outlines of Home Economics.</u> |                        |

He/She has been awarded Grade  on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form is Fifth January  
one thousand nine hundred and Fifty-nine ( 5-1-1959 ).

15th July, 1976

*Gh*  
Asstt. Secretary

*Munir*  
SECRETARY

This certificate is issued without alteration or erasure.

S. No 153147

Roll No. 17232



# BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan  
INTERMEDIATE EXAMINATION

Humanities Group  
SESSION 1985 (ANNUAL)

THIS IS TO CERTIFY THAT Farzana Bano

Son/Daughter of Ghulam Hussain

and a resident of Peshawar District

Registered No. 26-B/P-83 has passed the *Intermediate Examination* of

the Board of Intermediate & Secondary Education, Peshawar held in April/May, 1985

as a *Private candidate*. He/She obtained 49.4 Marks out of 1000 x 100

and has been placed in Grade  Representing Fair

The Examination was taken as a whole/in parts.

*Handwritten signature and date: 2/2/85*

*Handwritten signature*  
Asstt. Secretary

31-August, 1985

This certificate is issued without alteration or erasure.

*Handwritten signature*  
Secretary



44

EDUCATION DEPARTMENT  
N.W.F. PROVINCE, PESHAWAR.



PRIMARY TEACHERS CERTIFICATE  
(SEMESTER SYSTEM)

Roll No. 29

Commulative Letter Grade .....

Commulative S. P. A. 2.7

Certified that Muhammad Zaid, son/daughter of Charles Samsudin  
resident of ..... District .....  
born on 2.1.1932 ( ..... )  
having passed the Primary Teacher Certificate Semester System is qualified to teach in the Primary Classes of a  
School.  
Trained at the Government Training School ..... for young teachers  
Session 19 76. 19 77

*Attested*

Note:—This Certificate may be made permanent after three years approved service.

Marks obtained.

1. Theory	574
2. Teaching Practice	152
Total	726
Percentage score	61.5

Dated Peshawar,  
31st October 77  
the 19

*Khalid Hussain*  
Registrar,  
Departmental Examinations,  
Education Department, Peshawar.

To,

The Honourable Chairman,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar

460  
2/12/13

Subject: Application for Transfer of Case to a Judicial Member of the Tribunal

Sir,

The applicant/appellant respectfully submits as under:

1. That the applicant/appellant had filed an Appeal (No.860/2013) before the Honourable Tribunal on 06-05-2013.
2. That the applicant/appellant has appointed Mr. Abdul Matin S/O Abdur Rauf, as her Special Attorney to plead and argue her case and assist the Honourable Tribunal to decide the same on merit.
3. That the case was assigned to Mr. Sultan Mehmood, the member of the Tribunal.
4. It is sorry to say that a lengthy period of six months has elapsed but so far the case has not been admitted. Whenever the case is fixed for preliminary hearing, the Member of the Tribunal (Mr. Sultan Mehmood) raises the same objection that the Special Attorney is not allowed to argue the case. As such the case is adjourned to the next date.
5. That on 04-11-2013, the case was fixed before the Judicial Member (Mr. Aamir Nazir) who ordered the Attorney of the applicant/appellant to produce the appellant before the Tribunal on the next date i.e 26-11-2013, so that the power of attorney could be confirmed and case could be argued by the Attorney (Mr. Abdul Matin).
6. That unfortunately the case was again placed before Mr. Sultan Mehmood (Member) on 26-11-2013. Though the applicant/appellant was present before the Tribunal and requested the Member (Mr. Sultan Mehmood) to allow her Attorney (Mr. Abdul Matin) to argue the case but the Member did not agree. So the case could not be heard and adjourned to the next date i.e. 09-12-2013.
7. The Civil Procedure Code allows an Attorney to argue the case on behalf of the applicant/appellant but the Member (Mr. Sultan Mehmood) is reluctant to hear the

Be fixed for  
preliminary hearing  
before Bench 2  
on the date fixed.  
U S 12/13

**VAKALATNAMA**

IN THE COURT OF Khyber Pakhtunkhwa Service Tribunal Peshawar

OF 2013

Jarzana Bano

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

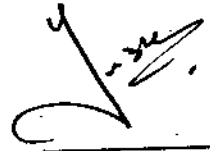
Education Dept.

(RESPONDENT)  
(DEFENDANT)

I/We Jarzana Bano

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 25 / 12 / 2013



**CLIENT**

**ACCEPTED**

**NOOR MOHAMMAD KHATTAK  
(ADVOCATE)**

**OFFICE:**

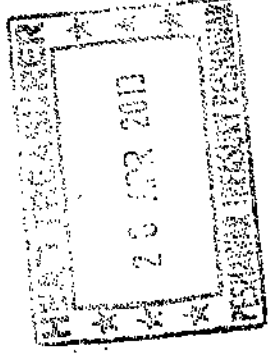
Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141



فصلنامه علمی و پژوهشی  
شماره ۰۶  
۱۳



*[Signature]*  
RECEIVED  
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**BEFORE THE REGISTRAR SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,  
PESHAWAR.**

Service Appeal No: 861/2013

Farzana Bano District Peshawar.

.....Appellant.

VERSUS

Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar, & others.

**An Application for provision of copy as captioned above Service Appeal**

Respectfully Shewth :-

- 1 That this office has been served with a notice to file reply on the date fixed for hearing before the Service Tribunal Peshawar on 04/6/2014.
- 2 Copy of the appeal has not yet received to this Directorate.

Therefore, it is requested that your honour would be pleased to issue orders to provide/issue the copy of the appeal & send to this office and to enable this office to prepare a reply for submission before the Hon! able Tribunal.

Your's Obediently

Asstt: Director (Lit: II)  
E&SE Khyber Pakhtunkhwa,  
Peshawar.

*Needful be done, if  
already not done.*

*Reader  
concerned*

*9/6/14*

5

Final

1/2

P. B

To

The Director,  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

W.P. Provincial  
Service Tribunal  
Diary No. 75-A  
Dated 13-2-15

Through: **Proper Channel**

Subject: **Departmental Appeal against the impugned Final Seniority List of SETs (SSTs) (BPS-16) as it stood on 22-11-2011, issued by the Deputy Directress (Establishment), received by the appellant through court proceedings of the Tribunal on 2-2-2015, whereby the appellant has been deprived of her due seniority**

Sir,

The appellant respectfully submits as under:

1. That the appellant had initially joined the service as PST on 11-3-1978.
2. That on the basis of requisite qualification and experience, the appellant, as an in-service teacher was selected and appointed as an SET on 25-3-1996.
3. That another teacher namely Naz Parveen who initially joined the service as CT on 5-1-1986 was also selected and appointed as SET (BPS-16) on the same day i.e. 25-3-1996.
4. That the appellant and the other SETs, including Naz Parveen, were upgraded in BPS-17 on 1-10-2007.
5. That the appellant joined the service on 11-3-1978 while Naz Parveen joined the service on 5-1-1986. Therefore, the appellant is senior to Naz Parveen. Moreover, the appellant and Naz Parveen being in-service teachers were selected and appointed as SET on the same day i.e. 25-3-1996. Therefore, on the basis of more service, the appellant should have been placed before Naz Parveen in the Seniority list but the latter has been shown senior to the appellant in impugned seniority list. Appellant appears at S.No.609 while Naz Parveen stands at S.No.13. So through the said impugned seniority list, the appellant has been deprived of her due seniority as well as regular promotion in BPS-17.
6. That the impugned seniority list has neither been prepared according to rules nor notified according to law. It is collection of haphazard record (copy annexed).
7. That the impugned seniority list was not circulated among the incumbents.
8. That the impugned seniority list is neither complete in all respect nor it has been issued by the competent authority i.e. Director Elementary & Secondary Education



who is authorized to issue the final seniority list of the SETs (BPS-16). The Deputy Directress is not competent to issue final seniority list.

9. That the Tribunal while hearing the case of the appellant had ordered the Respondents to produce the record of appellant's appeal alongwith seniority list about more than one year ago but the Respondents badly failed to produce the required documents and the seniority list well in time. Now they have produced the impugned seniority list consisting of three pages after a long delay. It means that actually there existed no legal and valid seniority list with the Department but in order to deceive the Tribunal the Respondents have played a clever trick by producing the impugned seniority list.
10. If the seniority list had been genuine and logical, the name of the appellant would have appeared before Naz Parveen who is much more junior to the appellant in service.
11. That the appellant is better qualified than Naz Parveen. The former is MA, M.Ed while the latter is only BA B.Ed. But the Department on the basis of the unlawful seniority list has promoted Naz Parveen on regular basis in BPS-17 vide order dated 26-2-2013. The appellant has already challenged the said order of promotion dated 26-2-2013 before the Service Tribunal.
12. That under the circumstances as mentioned above, the impugned seniority list is liable to be cancelled and a legal valid seniority list be prepared and notified according to law wherein the applicant be placed senior to Mst. Naz Parveen.

It is humbly prayed that accepting this Departmental Appeal the impugned seniority list of SETs, as mentioned above, may kindly be repealed and a legal valid seniority list be issued wherein the appellant be given her due place prior to Naz Parveen.

Dated 11-2-2015

Yours obediently

  
Mst. Farzana Bano (SET)  
Headmistress

GGMS New Jehangir Pura Peshawar

Copy of the above for information and necessary action to:

1. Secretary to the Govt. of KPK, Elementary & Secondary Education, Peshawar.
2. Registrar, KPK Service Tribunal Peshawar with humble submission that this Departmental Appeal may kindly be placed at the court file of the appellant's appeal No. **861 /2013 (FARZANA BANO VS EDUCATION) NEXT DATE 24-2-2015.**
3. The Deputy Directress (Establishment) Directorate of Elementary & Secondary Education KPK Peshawar.
4. D.E.O (Female) Peshawar.

  
Mst. Farzana Bano SET

DIRECTORATE OF ELEMENTARY AND  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR.

NO. <sup>2279-82</sup> / File No. A-88/PSI/SET(F) B-16  
DATED PESHAWAR THE ... 23/11/2011.

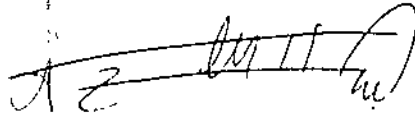
To

1. The Director of Education FATA Peshawar.
2. The Director of Curriculum & Teacher Education  
Khyber Pakhtukhwa, Abbotabad.
3. Director PITE Khyber Pakhtukhwa.
4. All Executive District Officers (E&SE)  
In Khyber Pakhtukhwa.

Subject:

FINAL SENIORITY LIST OF SET (FEMALE) BPS-16

A copy of the final seniority list of SETs (F) B-16 duly approved by the  
competent authority stood 22.11.2011 is submitted here with for information /  
record.

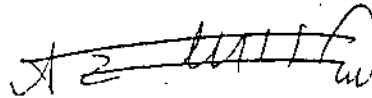


Deputy Director (Establishment)  
E&SE Khyber Pakhtukhwa Peshawar.

Encls: No. <sup>2283-84</sup> .....

Copy to the

1. PS to Secretary to Govt. of Khyber Pakhtukhwa E&SE Deptt:
2. P/A to Director E&SE Khyber Pakhtukhwa Peshawar.



Deputy Director (Establishment)  
E&SE Khyber Pakhtukhwa Peshawar.

FINAL SENIORITY LIST OF SETS FEMALE OF ELEMENTARY AND SECONDARY

4223/12011/11/11

IN KIRWA STOOD ON


*Decision*  
*17/11/2011*

S.No.	Name / Father's Name / Qualifications	School	Pass. B Ed / Matric /	Post /	Date of Ist. Appt. in Edu. Deptt.	D/o Appt. / Approval of SET Post	Remarks
1	Anwar Sultan SET BA 3 Ed D/O ASGJ Havan	GGHS Dargal Malakand	1SS/400/1 000	1,3,1854/Malakand	27.4.1948	8.3.1988	Abbsent
2	Kausar Nahed MSc E Ed D/O Shan	ASDEO/PCHD	1SC-1442/1 000	22,6,58/Peshawar	9.12.85	2.10.88	
3	Amul Basit BA D.Ed C.O Zia-Ur-Raza	GGHS Jareed Mansehra	1SS/529/1 000	7,7,59/Mansehra	12.11.85	13.10.88	Transfered to 1/1/88
4	Mighal Yasmeen BA B Ed D/O Jahanzaib Yousof	GGHS No2 A, Abad	2CC/539/10 00	8,4,63/A, Abad	2.6.88	13.10.88	
5	Zahida Yasmeen EA Bed D O S-3-SETI H-550 Shan	GGHS Kari Wan F.R.D.I.Khan	2CC/539/10 00	D.I.Khan		14.12.89	P.T.D
6	Musarat Shehroz BA 3ed D/O H-550 Shan	GGHS Ogi Mansehra	1SS/509/1 000	30,4,58/A, Abad	11.10.81	14.12.89	
7	Shamin Bibi BA BEd O/O Abd. Rafiq	GGHS Boghara Karak	1SS/545/1 000	Gannu		20.10.89	
8	Rehana Kausar BA Ed D O H-550 Shan	GGHS Kot Wali A, Abad	2CC/310/10 00	A, Abad		21.12.89	
9	Khadija Saida BSc Ued D/O Saad Agha	GGHS Haji Gali A, Abad	1SS/359/1 000	Mansehra		21.12.89	
10	Lubna Tuzam BSc Ed D/O F-550 Shan	GGHS Unanaza	1SS/562/1 000	10,4,64/Peshawar		21.12.89	
11	Mighal Yasmeen BA BEd D/O H-550 Shan	ASDC/PE/D.I.Khan	2CC/518/10 00	22,4,60/D I.Khan		23.12.89	
12	Shahcena Yasmeen BSc Ed D/O H-550 Shan	GGHS Shukardara Kohat	1SS/559/1 000	1,6,60/Kohat	6.6.88	23.12.89	On deputation
13	NOZ PARVON SET BA BEd	GGHS Jehangir puran pesh.	1999	12,3,62/Peshawar	4.5.85	02.04.90	H/M
14	Falakh Noz SET MSc EED	GGHS S Kalla A, Abad	1990	31,8,61/A, Abad	23.6.87	08.11.90	Shifted from 6c
15	Zakia Begum SET BA 3ED	GGHS No. 1 Srai Norang Lawi	1996	15,02,1961	01.01.1997	08.11.90	Double with 2/0
16	Mehmooda Suliana MSc Bed D/O Sultan Shahzad	GGHS Sirkot Haripur	1SC/347/1 000		3.10.89	26.11.90	
17	Parveen Akhtar BA BEd D/O Khan Basmah	GGHS Thaji Nerali	1SS/422/1 000	1,6,00/Kohat		26.11.90	
18	Fatmat Jehan BA DED D/O Saif Shah	GGHS Swabi	1SS/521/1 000	7,2,60/Mardan	9.12.82	26.11.90	
19	Vedolita Nahed BA EED D/O Raja Malik	GGHS Dak Basud NSR	1SS/459/1 000	1,6,62/Peshawar	18.3.90	26.11.90	

q.p.c  
q.d.

S.No.	Name /Father Is Name/ Qualifications	School	Year of Passing B.Ed /Merit	Date of Birth / Domicile	Date of Iss: Applt: In Edu: Dept:	D/o Appt: Approval of SET Pos:	Remarks
1	2	3	4	5	6	7	8
609	Shahjeen Akhtar, SET, BA, BEd	GGHS, Samand Khan Killi FR Peshawar	1991	8.10.51/NWA	8.11.86	25.3.95	
610	Nusrat Paveen, SET, MA, BEd	GGHS, Kalpant, Bunit	1992	15.6.52/Bunit	18.7.85	25.3.95	
611	Tajjala Begum, SET, BSc, BEd	GGHS, Shabqadar Chd.	1992	14.6.78/Charsadda	1.3.88	25.3.95	
612	Hamida srah, SET, M.Sc, BEd	GGHS, Landi Attab Posr.	1992	4.3.67 Swabi	8.11.90	25.3.95	
613	Roshan Aa, SET, BSc, BEd	GGHS, Mulazai Dikhan	1992	15.4.53/DIK	26.5.95	25.3.95	
614	Najias Khatoon, SET, Bsc, BEd	GGHS, S Naurang Bannu	1992	1.5.65/DIK	26.5.95	25.3.95	
615	Kasoom SET BA, BEd	GGHS, Kala Dir	1993	15.10.70/Dir	30.7.95	25.3.95	
616	Naz Perwar, SET, MA, BEd	GGMS, Shann Ghundi M Agy	1993	8.2.67 M Agy	20.4.85	25.3.95	
617	Rozina Imraz, SET, Ssc, BEd	GGHS, Ghorwada Bannu	1993	5.9.67 D.likhan	13.12.92	25.3.95	
618	30/Ashis SET MA, BEd	GGHS, Kumbher Dir	1993	34.67 Chitral	4.9.86	25.3.95	
619	30/Latika SET MA, BEd	GGMS, Inooni Chitral	1993	5.2.55/Chitral	1.12.82	25.3.95	
620	Mussarat Jehan, SET MA, BEd	GGHSS, Timergan Dir	1993	15.12.55/Dir	25.7.83	25.3.95	
621	Nusrat Paveen, SET BA, BEd	GGHS, Samarbagh Dir	1993	28.10.54/Chitral	17.11.87	25.3.95	
622	Yasmin Begum, SET BA, BEd d/o Sharam Khan	GGCMS Qual Daira MKD	1992	2.2.70 Malakand	20.9.89	25.3.95	
623	Fazilat SET BA, BEd	GGMS, Fateh Pur Swat	1993	30.4.47/Swat	28.9.89	25.3.95	
624	Kashwar Surana, SET BA, BEd	GGMS, Tolakan Malakand	1993	15.4.73/Malakand	11.4.88	25.3.95	
625	Fehmida Begum, SET BA, BEd	GGMS, Khazana Dir (L)	1993	12.6.62/Dir	16.7.95	25.3.95	
626	Sul Nasreen, SET, M.Sc, BEd	GGHS	1993	1.5.65/Haripur	29.10.95	25.3.95	
627	Noor Jehan Begum, SET BA, BEd	GGHS, Rabat Dir (L)	1993	19.3.53/Chitral	21.12.81	25.3.95	
628	Dshad Begum, SET MA, BEd	GGHS, Malta Swat	1993	1.1.60/Swat	25.11.80	25.3.95	

S.No.	Name /Father Is Name/ Qualifications	School	Year of Passing B.Ed /Merit	Date of Birth / Domicile	Date of Ist. Apptt: in Edu:Dept:	D/o Apptt / Approval of SET Post	Remarks
1	2	3	4	5	6	7	8
1763	Nighat Seema SET BA BED D/o Zahir shah			27.12.1982/FR Peshawar			
1764	Khurshida Jan SET BA BED D/o Habib Ali			25.02.1978/orok Agy			
1765	Shatab un Nisa SET BA BED D/o Muhammad Shamim Khan			03.04.1983/FR Bannu			
1766	Syeda Ume salma SET BA BED D/o Syed Anwar shah			10.08.1981/orok Agy			
1767	Shagufa Chaman SET BA BED D/o Muhammad Younis			28.09.1972/Baj' Agy			
1768	Rakhsanda Sarwar SET BA BED D/o Ghulam Sarwar			12.04.1979/Moh Agy			
1769	Bibi Zuhra SET BA BED D/o S.Sultan Ali shah			12.11.19769/Kurram Agy			
1770	Saeeda Begum SET BA BED D/o Hazrat Ali			01.04.1983/Moh Agy			
1771	Ghazal Saeed SET BA BED D/o Khan Said			02.05.1984/Moh Agy			
1772	Sakina Nawab SET BA BED D/o Haji Nawab Ali			21.03.1978/Kurram Agy			
1773	Hajira SET BA BED D/o Faqir Muhammad			28.11.1976/Moh Agy			
1774	Nadia Ahmad SET BA BED D/o Ahmad gul			02.02.1980/Moh Agy			
1775	Nasim Orakzai SET BA BED D/o Syed Khan Orkazai			18.04.1960/Kurram Agy			

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

Before the Higher Caribbean Service Tribunal, Port of Spain

Source Appeal No 861/2013

Ms. Farzana Baro  
vs

Education Department

Subject: Application for adjournment

Sir,

As the Counsel of the Appellant is out of Port of Spain today, therefore, it is being prayed that the case may kindly be adjourned and a shortest date may please be given so that the Hon. Chairman and you yourself may hear this case.

Dated: 20-5-2015

Yours Obediently  
Yours


Ms. FARZANA BARO  
(Appellant)

Receipt

Recievd Rs. 1000/- of cast in appeal  
of Mst. Farzana Bano vs Education  
Deptt. in appeal No. 861 / 2013 which  
is fixed for hearing today dated 26/5/2016

Dated: 1

Appellant  
Through: G.  
Counsel  
Noor Mohammad Khattak  
Advocate

Attest  
  
26.05.16

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal No: 861/ 2013**

**Mst: Farzana Bano SET GGMS New Jehangir Pura, Peshawar. ....Appellant.**

**VERSUS**

**Secretary E&SE Department, Khyber Pakhtunkhwa and others. ....Respondents**

**JOINT PARAWISE COMMENTS FOR & ON BEHALF OF RESPONDENTS No: 1-7.**

**Respectfully Sheweth :-**

The Respondents submit as under:-

**PRELIMINARY OBJECTIONS.**

- 1 That the Appellant has got no cause of action / locus standi.
- 2 That the instant Service Appeal is badly time barred. Hence is liable to be dismissed.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal. Hence liable to be dismissed.
- 4 That the instant service appeal is against the relevant provisions of law.
- 5 That the appellant is not an aggrieved person under article 212 of the constitution of the Islamic Republic of Pakistan 1973.
- 6 That the appellant has not come to this Honorable Tribunal with clean hands.
- 7 That the instant appeal is liable to be dismissed for mis-joinder & non-joinder of the necessary parties to the present appeal.
- 8 That the appellant is estopped by her own conduct to file the instant appeal.
- 9 That the instant Service Appeal is not maintainable in the present circumstances of the case.
- 10 That the Notification dated 26-2-2013 is legally competent & liable to be maintained in favour of the Respondents in the interest of justice.
- 11 That this Honorable Tribunal has got no jurisdiction to entertain the instant Service Appeal.
- 12 That the instant Appeal is barred by law.

**ON FACTS .**

- 1 That Para-1 needs no comments being pertains to the service record of the appellant.
- 2 That Para-2 also relates to the service record of the appellant, hence needs no further comments.



- 3 That Para-3 is correct to the extent that both the Appellant & Respondent No: 5 <sup>(Mst Naz Parveen)</sup> were appointed against SET now SST (F) posts vide appointment order dated 25-3-1996 issued by the Respondent No: 2. However it is further submitted that Mst: Naz Parveen was appointed against the SET(F) post on 02-4-1990. She then filed a Service Appeal No: 316 / 1999 under titled Mst: Naz Parveen Versus Govt: of KPK & others on 22-2-1999 before this Honorable Tribunal which was decided on 14-5-2004 in favour of the appellant with the directions to the Respondent Department for the grant of graded pay against the SET(F) post wef 02-4-1990 by this Honorable Tribunal.

Therefore, in compliance of the judgment dated 14-5-2004, the Respondent Department has been pleased to allow graded pay wef 02-4-1990 vide Notification dated 04-2-2007, hence the Respondent No: 5 <sup>(Mst Naz Parveen)</sup> stood senior from the appellant and has thus allowed promotion against the Headmistress post by the Respondent Department on the basis of her seniority cum fitness. (copy of the said Notification is Annexure-A) as well as judgment of the Tribunal is Annexure-B).

- 4 That Para-4 is correct. Hence needs no further comments.
- 5 That Para-5 is incorrect & denied. Detailed reply of this Para has been given in para-3. Hence needs no further comments.
- 6 That Para-6 needs no comments, being pertains to the record, *and as explained vide Para 3 above*
- 7 That Para-7 is correct, hence no comments.
- 8 That Para-8 is also correct. The departmental appeal of the appellant has been rejected vide appellate order dated 05-4-2013 issued by the Respondent No: 3 in the interest of justice (copy of the same as Annexure-B).
- 9 That Para-9 is legal. However, the Respondents further submits on the following ground inter alia :-

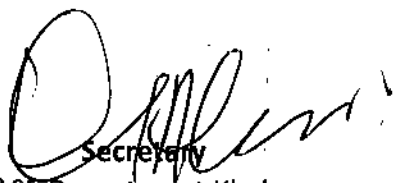
#### ON GROUNDS .

- A That ground-A is incorrect & denied. The impugned order dated 26-2-2013 is legal & is liable to be maintained in favour of the Respondents.
- B Incorrect & denied. The impugned order dated 26-2-2013 is based on law rules & policy, hence is liable to be maintained.
- C Incorrect & denied. Detailed reply has been given in Para-3 of the instant reply, Hence needs no further comments.
- D Incorrect & denied. The Respondent No: 5 <sup>(Mst Naz Parveen)</sup> is senior to the appellant in the light of the judgment dated 14-5-2004 passed by this Honorable Tribunal vide which <sup>(Mst Naz Parveen)</sup> has been granted graded pay wef 02-4-1990 against the SET(F) post vide the above mentioned Notification attached as Annexure-A .
- E Incorrect & denied. Detailed reply of this ground has already been given in the foregoing paras.
- F Incorrect & denied. Hence needs no comments, <sup>(Mst Naz Parveen)</sup> being pertains to the academic record of the appellant.

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- G Incorrect & denied. Detailed reply has been given above.
- H Incorrect & denied. As replied in Para-3. Hence needs no <sup>further</sup> comments.
- I Needs no comments.
- J Needs no comments. However the Respondents seek leave of this Honorable Tribunal to submit additional grounds & case law at the time of arguments before this Honorable Bench.

**In view of the above made submissions, it is requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favor of the Respondent Department.**



Secretary  
E&SE Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No: 1 & 2)

17/02/2016  
Director

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
(Respondent No: 3, 4 & 7)



Secretary  
(Finance).Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No: 6)



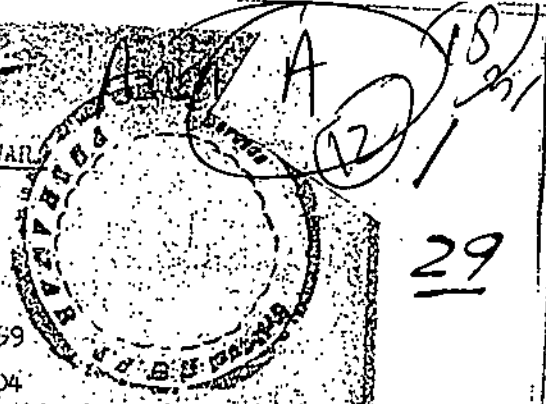
Secretary  
(Estab: ) Department Khyber  
Pakhtunkhwa, Peshawar  
(Respondents No: 5)

BEFORE THE NWP SERVICE TRIBUNAL PESHAWAR

Appeal No. 316/1999

Date of institution - 22.2.1999

Date of decision - 14.5.2004



Mst. Naz Parveen SET, GGMS, Jehangir Pura Peshawar.

(APPELLANT)

VERSUS

1. Secretary Education NWP Peshawar.
2. Director Secondary Education NWP, Peshawar.
3. Director of Education (DATA) NWP, Peshawar.
4. D.O. Secondary, Peshawar.

(RESPONDENTS)

Mr. Abdullillah Laidi Advocate.  
Mr. Gulfigar Ali Govt. Pleader.

..For appellant.  
..For respondents.

MR. SAHIB JAN  
MR. MUHAMMAD SHAUKAT

..MEMBER.  
..MEMBER.

JUDGMENT.

MR. SAHIB JAN, MEMBER:- This appeal has been filed by the appellant for the award of graded pay of SET post from the date of her appointment i.e. 2.4.1990.

2. Brief facts of the case as averred in the memoranda of appeal are that the appellant was appointed as SET with fixed pay in HPS-15 at Semad Khan, Khyber P.R., Peshawar, vide order dated 2.4.1990. However, the appellant is posted in the post of as SET at GGMS Jehangir Pura Peshawar. The appellant has passed B.A. Examination on 13.7.1985 and also passed B.Ed. Examination in 1989. The appellant was awarded graded pay with regularization of service w.e.f. 25.9.1996 instead of 2.4.1990. The appellant submitted a departmental appeal for the grant of graded pay w.e.f. 2.4.1990 but no response has been received.

ATTESTED

Signature

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within the statutory period of 90 days.

3. The appellant has assailed the impugned denial on the grounds that the appellant was fully qualified from the date of appointment. Respondent No. 2 regularized her service and awarded graded pay w.e.f. 25.3.1996 instead of 2.4.1990, i.e. the date of her appointment. The case of appellant is also identical to the cases of Gulzar Khan BEd and Israr Begum BEd who have been awarded graded pay from the date of their working as such by this Tribunal.

4. The respondents have filed their reply, contested the appeal and denied the claim of the appellant. Arguments of the learned counsel for the parties have been heard and record perused.

5. The learned counsel for the appellant argued that she appellant joined the Education Department as SV Teacher on 2.4.1985. Later on, on 2.4.1990 the appellant was appointed as SET Teacher against the vacant post of SET on fixed pay vide her appointment order dated 2.4.1990. The appellant continued to work as SET Teacher on fixed pay till 25.3.96 when she was appointed as SET Teacher on regular basis vide appointment order dated 25.3.1996. The learned counsel for the appellant submitted that the appellant has passed her B.Ed in the year 1989 well before her appointment as SET on fixed pay on 2.4.1990 and as such she was entitled for the graded pay w.e.f. 2.4.1990 instead of 25.3.1996. The learned counsel contended that a number of SET Teachers who were appointed as SET Teachers on fixed pay have been given graded pay of the post of SET from the date of their professional qualification of B.Ed while the appellant has been discriminated. The learned counsel urged that the appellant may be allowed graded pay w.e.f. 2.4.1990 as she was professionally qualified for the SET post on 2.4.1990.

ATTESTED

Handwritten signature/initials

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The Tribunal observes that the appellant was appointed as Teacher temporarily against the vacant post of S.T on 2.4.1990 by the Director of Education, the competent authority. She was professionally qualified for the post of S.T at the time of her temporary appointment as S.T as she had passed her B.Ed in the year 1989. She had been serving/ discharging her duties as S.T Teacher against the post held by her continuously till her appointment as S.T on regular basis. As she was professionally qualified on 2.4.90 she was entitled to the running pay w.e.f. 2.4.1990 as argued by the learned counsel for the appellant and as already held by the Service Tribunal and Hon'ble Supreme Court of Pakistan vide PLJ-1994-(C.S)3.C.414.

7. In view of the above discussion, the appeal of the appellant is accepted and she is held to be entitled to the graded pay and increments of the S.T post w.e.f. 2.4.1990 with no order as to costs. File be consigned to the record.

ATTESTED  
15.5.2004

*(Signature)*  
(MIAN SAHIB JAFAR)  
MEMBER

*(Signature)*  
(MUHAMMAD SHAUKAT)  
MEMBER

Certified to be true copy  
SECRETARY  
GOVT Service Tribunal  
Peshawar.

Date of Presentation of Applicant 2-12-04  
Number of Words 1200  
Copping Fee 8-0-0  
Urgent 2-12-04  
Total 10-0-0  
Name of Copyist [Signature]  
Date of Completion of Copy 2-12-04  
Date of Delivery of Copy 2-12-04

Annex B

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OFFICE OF THE DIRECTOR SCHOOLS & LITERACY NWFP, PESHAWAR

NOTIFICATION

In supersession of Notification issued under Endst No.1962-64/A-4 / SET(Female)/G.Casses/05, dated 19/5/2006 and in pursuance of the Judgment of Service Tribunal, NWFP, Peshawar dated 14/5/2004 in appeal No.316/1999, Mrs. Naz Parveen, SET Govt. Girls Middle School New Jehangir Pura Peshawar, is hereby allowed graded pay of SET as under:

<u>With Effect From</u>	<u>B.P.S</u>
2/4/1990 to 31/5/1991.	BPS-15
01/6/1991	BPS-16

Necessary entry to this effect should be made in her relevant record.

Director Schools & Literacy  
NWFP, Peshawar

Endst No. 251-54 /F.No.5/A-17/SET(F)/G.Casses/2005  
Dated 4/2 /2007

Copy forwarded for information & necessary action to the:-

1. Executive District Officer (S&L) Peshawar.
2. District Account Officer, Peshawar.
3. Mrs. Naz Parveen, SET, GGMS Jehangir Pura Peshawar.
4. PA to Director S&L, NWFP.

Deputy Director (Esrb)
   
 Directorate of Schools & Literacy
   
 NWFP, Peshawar

**Before the Khyber Pakhtunkhwa Service Tribunal Peshawar****Service Appeal No.861/2013**

Mst. Farzana Bano D/o Ghulam Hussain,  
(SET) Headmistress, Govt. Girls Middle School,  
New Jehangir Pura, Wazir Bagh Road Peshawar

.....Appellant

**VERSUS**

1. The Secretary to the Government of Khyber Pakhtunkhwa, Elementary & Secondary Education, Civil Secretariat, Peshawar.
2. The Chief Secretary to the Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. The Deputy Directress, Establishment (F) Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
4. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
5. The Secretary to the Government of Khyber Pakhtunkhwa, Establishment Department, Civil Secretariat, Peshawar.
6. The Secretary to the Government of Khyber Pakhtunkhwa, Finance Department, Civil Secretariat, Peshawar.
7. The District Education Officer (Female) GT Road, Peshawar.

.....Respondents

**Rejoinder on behalf of the Appellant to the Comments of Respondents**

Sir,

The rejoinder on behalf of the Appellant is as under:

**Answers to the Preliminary objections**

1. Incorrect. The Appellant has got cause of action and locus standi. The Appellant filed a departmental appeal against the Impugned Order of Promotion dated 26-2-2013 but the same was unlawfully rejected by the Respondent No.3. Therefore, the Appellant filed the instant Appeal before the Honourable Tribunal for the redress of her grievance. So there is cause of action and the case of the appellant is a prima facie case so she has locus standi.
2. Incorrect. The appeal has been filed well in time according to the law and the Appellant is fully hopeful of her success on merit.
3. Incorrect. The Appellant has brought all the facts and figures before the Honourable Tribunal as crystal clear. The appeal has been filed as per law.
4. Incorrect. The appeal is fully covered by the relevant provisions of law and it is complete in all respect.
5. Incorrect. The Appellant is really an aggrieved person. The Respondent Department unlawfully deprived her of her due promotion vide Impugned Order dated 26-2-2013 and also rejected her departmental appeal on 5-4-2013. Therefore, she had to knock

at the door of Tribunal after rejection of her departmental appeal by the Respondent No.3, who was not competent to reject the same.

6. Incorrect. The Appellant has come to the Tribunal with clean hands while the Respondents have not come to the Tribunal with clean hands.
7. Incorrect. The Respondents have not pointed out any misjoinder and non-joinder of the necessary parties. There are seven Respondents in the instant Appeal but only four Respondents have submitted their reply while Respondents No.2, 3 & 7 have not given any response. So under this situation the case of the Respondents is badly damaged.
8. Incorrect. The Appellant is not estopped by her conduct to bring the instant Appeal before the Tribunal. There is cause of action and the Appellant has locus standi.
9. Incorrect. The case of the Appellant is fully fit and based on facts. It is complete in all respect while the Tribunal has full jurisdiction to decide this case on merit. The Appellant is senior to Mst: Naz Parveen. The Appellant joined the service in Education Department on 11-3-1978 while Mst: Naz Parveen joined the service on 5-1-1985. The appellant & Mst: Naz Parveen being in-service teachers were appointed as SET in BPS-16 on 25-3-1996 on the basis of seniority cum fitness. Therefore, in this case depriving of the Appellant of her promotion is an act of discrimination on the part of the Respondent Department. Therefore, the appellant has invoked the jurisdiction of the Honourable Tribunal for the redress of her grievance. So the case is maintainable as there is cause of action and the Appeal is complete in all respect. The appellant is fully hopeful to succeed on merit.
10. Incorrect. That the Impugned Order dated 26-2-2013 is laible to be set aside alongwith appellate order dated 5-4-2013 which have snatched away the due right of the appellant.
11. Incorrect. The Tribunal has got full jurisdiction to entertain and decide this case on merit.
12. Incorrect. The Appeal is not barred by law. It has been filed complete in all respect having cause of action and the Honourable Tribunal is competent to decide the same on merit.

**Reply to the comments on Facts:**

1. The Respondents have not commented upon Para 1 of the Appeal. Hence Para 1 of the Appeal is correct.
2. The Respondents have not commented upon Para 2 of Appeal. Hence Para 2 of the Appeal is correct.
3. The Respondents have given self contradictory statement. On the one hand they state that the Appellant and Mst: Naz Parveen both were appointed as SETs on



regular basis on 25-3-1996, and on the other hand they state that Mst: Naz Parveen was appointed as SET on 2-4-1990. Therefore, the statement of the Respondents is not a legal and valid statement. Moreover, the Service Tribunal had allowed only graded pay to Mst: Naz Parveen and not seniority against the other senior SETs. But the Respondent Department placed Mst: Naz Parveen senior to the appellant in the impugned seniority list as it stood on 22-11-2011. So the Respondent Department not only granted undue seniority to Mst: Naz Parveen but also granted her promotion on regular basis through impugned order dated 26-2-2013. In fact Mst: Naz Parveen (who appears at the top of impugned order of promotion dated 26-2-2013) joined the service on 5-1-1985 while the appellant joined the service on 11-3-1978. So the appellant is much more senior to Mst: Naz Parveen. It is further added that being in-service teachers both of them (appellant and Naz Parveen) were selected and appointed as SETs on 25-3-1996. So in this case the seniority of both should be fixed from the date of their entry in service but giving undue favour to Mst: Naz Parveen, the Respondent Department placed her senior to the Appellant in the impugned seniority list. It is further added that the Appellant and Mst: Naz Parveen alongwith other SETs, were upgraded in BPS-17 on 1-10-2007. Therefore, it is beyond comprehension how a junior has been awarded and senior has been discarded. If Mst: Naz Parveen being junior to the appellant is promoted as Headmistress on regular basis in BPS-17 under the impugned order dated 26-2-2013, than the Appellant being senior is also entitled to be promoted as Headmistress from the same date i.e. 26-2-2013 in BPS-17 on regular basis.

4. The Respondents have admitted Para 4 of the Appeal as correct. Hence Para 4 of the Appeal is correct.
5. Incorrect and false. The Appellant submitted applications for her regular promotion to the Respondents. Her application was received by the office of the Respondent No.1 under Diary No.186 dated 6-7-2012. Copies of the same were also provided to the other Respondents. The Respondents have deliberately concealed the fact.
6. Respondents have admitted Para 6 of the appeal as correct. Hence Para 6 of the Appeal is correct.
7. Respondents have admitted Para 7 of the appeal as correct. Hence Para 7 of the appeal is correct.
8. It is submitted that the departmental Appeal was unlawfully rejected by the Respondent No.3 who was not competent to reject the same. The departmental appeal was addressed to the Chief Secretary (Respondent No.2) but the Respondent No.3 who is not authorized to reject the appeal, had rejected the same. So it is a case of colourful exercise of power or misuse of power on the part of the Respondent

No.3. Therefore, the Appellant had to invoke the jurisdiction of the Honourable Tribunal for the redress of her grievance.

9. That the Appellant has rightly knocked at the door of Honourable Tribunal against the injustice and discrimination.

**Reply to the comments on Grounds**

- a) Incorrect and false. Impugned Order dated 26-02-2013 and the Appellant Order dated 05-04-2013 are unlawful and invalid as they have been passed in the colorful exercise of power for collateral purposes without contemplated by law and as such of no consequences what so ever being malafide throughout. So they are liable to be set aside.
- b) Incorrect and false. The Impugned Order dated 26-02-2013 is based on an Impugned Seniority List which has neither been prepared and issued according to law nor it was properly circulated among all the incumbent. It is highly amazing that in the tentative Seniority List as it stood on 26-07-2010, the Appellant was at Serial No.562, while Mst. Naz Parveen did not appear anywhere in the said tentative list. But in the Impugned final Seniority List as it stood on 22-11-2011, all of a sudden Mst. Naz Parveen appears at Serial No.13, while the Appellant appears at Serial No.609. So it was a serious irregularity committed by the Respondent Department to extend unlawful favour to Mst. Naz Parveen who is much more Junior to the Appellant while the Appellant being Senior has been deprived of her due seniority. Therefore, the Respondent Department followed the policy of "Fair is Foul and Foul is Fair". So the Impugned Orders dated 26-02-2013, 05-04-2013 and the Impugned Seniority List dated 22-11-2011 are liable to be set aside. (Copy of Impugned Seniority List 22-11-2012 and Copy of tentative Seniority List dated 26-07-2010 are annexed as L & L-1.)
- c) Totally Incorrect and False. It is an admitted fact that the Appellant being in-service teacher was selected and appointed as S.E.T on 25-03-1996 in BPS-16. So negation of this fact is a nuisance on the part of the Respondents.
- d) Totally Incorrect and False. The Respondents have tried to negate the facts. They have already admitted that Mst. Naz Parveen joined the service on 05-01-1985 while the Appellant entered the service on 11-03-1978. So negation of these realities is a blunder on the part of the Respondents. It is further added that the Appellant who joined the service earlier is much more senior to Mst: Naz Parveen. The detail has been given above. The Service Tribunal allowed only graded pay to Mst: Naz Parveen and not Seniority against other Senior S.E.Ts including the Appellant. But the Respondent Department gave her undue seniority as well as promotion to BPS-17 under the Impugned Order dated 26-02-2013 and unlawfully deprived the Appellant.

- e) Incorrect and False. The Respondent Department has once again denied the facts. The Appellant entered the service on 11-03-1978 and so far she has rendered 35 years service with good record. The Appellant has not only been deprived of her due seniority but as well as promotion through Impugned Order dated 26-02-2013. The service of the Appellant w.e.f.11-03-1978 to 24-03-1996 had not been counted by the Respondent No.1 and as such the Appellant was deprived of her promotion while Mst: Naz Parveen was given undue favour and she was promoted. So it represents mal administration on the part of Respondent Department.
- f) Incorrect and false. The qualification record of the Appellant and Mst: Naz Parveen is on the record of the Respondent Department. The Appellant is much more qualified than Mst: Naz Parveen. Negation of this reality represents in-efficiency on the part of the Respondents.
- g) Incorrect and false. There is a relevant policy dated 28-1-2009 under which the appellant is entitled to be promoted not only in BPS-17 but also in BPS-18. The appellant has been working in BPS-17 w.e.f.1-10-2007 till date and her non gazetted service w.e.f.11-3-1978 to 24-3-1996 is countable under the relevant Policy of Promotion dated 28-1-2009 for the purpose of promotion. The denial of relevant Policy represents ignorance and inefficiency on the part of the Respondent Department. Moreover, no financial implications will involve if Appellant is allowed promotion w.e.f.26-2-2013 as she has been working in BPS-17 since 1-10-2007.
- h) Incorrect and false. The Appellant is fully fit to be promoted as Headmistress in BPS-17, on regular basis from the same date i.e.26-2-2013.
- i) The Respondents have not commented on Ground I of the appeal. The Appellant shall also rely on the additional grounds at the time of arguments.
- j) The Respondents have not commented upon Ground J of the Appeal. So Ground J of the appeal is correct. The Impugned Orders dated 26-2-2013 and 5-4-2013 are liable to be set aside alongwith impugned final seniority list dated 22-11-2011.


It is humbly prayed that setting aside the entire defence of the Respondents, the Appeal of the Appellant may kindly be accepted.

Dated 18/1/2017



**Mst: Farzana Bano**

(Appellant)



Through: Noor Muhammad  
Khattak Advocate, Peshawar.

**TENTATIVE SENIORITY LIST OF SETS (FEMALE)**  
**Prepared & Issued on 26-07-2010.**

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

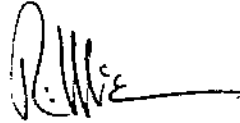
No. 7454-7480/File No. A-88/TSL/SET(F)B-16

Dated Peshawar the 26-7-2010

- To
1. The Director of Education (FATA) Peshawar
  2. The Director of Curriculum & Teachers Edu:  
Khyber Pakhtunkhwa A/Abad
  3. All Executive Distt: Officer (E&SE)  
in Khyber Pakhtunkhwa

Subject: TENTATIVE SENIORITY LIST OF SET (FEMALE) BPS-16

A copy of the Tentative Seniority list of SETs (F) (B-16) is enclosed herewith for information of all concerned who are working under your jurisdiction. The said seniority list should be brought into the notice of all SETs and their signatures (for having seen and checked the list thoroughly) should be obtained from them and kept in your office for record. In case of any appeal/objection raised out by the teachers concerned, their appeals alongwith documentary proof should reach this office within one month through your respective offices.



Deputy Directress (Establishment)  
E&SE, Khyber Pakhtunkhwa, Peshawar.

Endst: No. 7481-82

- Copy to the
1. PS to Secretary to Govt: of Khyber Pakhtunkhwa E&SE Deptt:
  2. P/A to Director E&SE, Khyber Pakhtunkhwa, Peshawar.



Deputy Directress (Establishment)  
E&SE, Khyber Pakhtunkhwa, Peshawar.

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

No. 7454-7480/File No. A-88/TSL/SET(F)B-16

Dated Peshawar the 26-7-2010

- To
1. The Director of Education (FATA) Peshawar
  2. The Director of Curriculum & Teachers Edu:  
Khyber Pakhtunkhwa A/Abad
  3. All Executive Distt: Officer (E&SE)  
in Khyber Pakhtunkhwa

Subject: TENTATIVE SENIORITY LIST OF SET (FEMALE) BPS-16

A copy of the Tentative Seniority list of SETs (F) (B-16) is enclosed herewith for information of all concerned who are working under your jurisdiction. The said seniority list should be brought into the notice of all SETs and their signatures (for having seen and checked the list thoroughly) should be obtained from them and kept in your office for record. In case of any appeal/objection raised out by the teachers concerned, their appeals alongwith documentary proof should reach this office within one month through your respective offices.

Deputy Directress (Establishment)  
E&SE, Khyber Pakhtunkhwa, Peshawar.

Endst: No. 7481-82

- Copy to the
1. PS to Secretary to Govt: of Khyber Pakhtunkhwa E&SE Deptt:
  2. P/A to Director E&SE, Khyber Pakhtunkhwa, Peshawar.

Deputy Directress (Establishment)  
E&SE, Khyber Pakhtunkhwa, Peshawar.

**TENTATIVE SENIORITY LIST OF SETS FEMALE OF ELEMENTARY AND SECONDARY EDUCATION Khyber PUKHTUN KHWA  
PREPARED ON/26-07-2010**

Sl No	Name /Father is Name/ Qualifications	School	Year of Passing B.Ed	Date of Birth / Domicile	Date of Ist. Edu: Deptt.	D/o Appt / Approval of SET Post	Remarks
1	2	3	4	5	6	7	8
1	Rubina Shaheen BSc Bed D/O Muhammad Rainzan	GGHS Ghazni Khel	1986/850/1200	24.5.66/D.J.Khan	24.9.90	2.9.91	
2	Shaheen Hanif MA Bed D/O Hamdulillah	GGHS Nar Sdrar Muhammad Khel	1986/464/1200	5.4.64/Bannu	14.2.91	3.9.91	
3	Yasmeen Akhtar BA Bed D/O Abdul Qayum	GGHS Takhti Nasrat Karak	1987/476/1000	Kara	"	3.9.91	
4	Farzana Nasreen BA Bed D/O Shekh Ihsanullah	GGMS Daraki D.J.Khan	1987/476/1000	8.2.54/D.J.Khan		3.9.91	
5	Sughra Bibi BA Bed D/O Khalil -u- Rehman	GGHS Barra Eassa D.J.Khan	1988/463/1000	18.12.53/D.J.Khan		3.9.91	
6	Sheeraz Begum BA Bed D/O Raja Wali Dad	GGHS Sherwan A Abad	1988/463/1000	20.2.61/A. Abad	14.10.80	3.9.91	
7	Fuzia Bokhari BA Bed D/O Syed Jafar Shah	GGMS Gul Bela Peshawar	1988/463/1000	30.4.62/Peshawar		3.9.91	
8	Anwar Sultana BA Bed D/O Syed Jan Badshah	GGMS Qasmi Mardan	1988/461/1000	1.6.60/Peshawar		3.9.91	
9	Shaheena Kaosar BA Bed D/O Awal Gul	GGHS Yaka Toot Peshawar	1988/416/1000	1.1.61/Peshawar		3.9.91	
10	Dure-Maknoon BA Bed D/O Syed Muhammad Zhid	GGHS Tor Dher Swabi	1988/453/1000	25.5.61/Mardan		3.9.91	
11	Shahida Tubasam BA Bed D/O Ishaq Iltahi	GGHS Hayelia	1988/452/1000	11.8.51/A. Abad	14.10.82	3.9.91	
12	Shahnaz Gul MA Bed D/O Malak Muhammad Iqbal	GGHS Nawansher A. Abad	1988/452/1000	10.1.56/A. Abad	1.10.83	3.9.91	
13	Fehmeeda Khatoon BA Bed D/O Abdul Wahid	GGHS Kapani Malakand	1988/868/1000	5.5.52/Mardam		3.9.91	
14	Yasmeen Akhtar BSc Bed D/O Muhammad Azam	GGHS D.J.Khan	1989/520/1200	18.0.61/D.J.Khan	27.11.85	3.9.91	
15	Lahira Shaheen BSc Bed D/O Pir Bakhs	GGHS Dabqri Peshawar	1989/800/1000	15/4/62/Peshawar		3.9.91	
16	Perveen Kaosar M Bed D/O Malak Krim Bakhs	GGHS Talar Khel Bannu	1990/676/1200	/D.J.Khan	12.11.90	3.9.91	
17	Kulsoom Jehan Akhtia BSc Bed D/O Muhammad Gui Akhar Niazi	GGHS No.1 Bannu	1990/676/1200	18.3.67/Bannu	3.9.91	3.9.91	


S No.	Name /Father's Name/ Qualification's	School	Year of Passing B.Ed	Date of Birth / Domicile	Date of Ist. Apptt. in Edu. Deptt.	D/O Apptt. Approval of SET Post	Remarks
1	2	3	4	5	6	7	8
18	Mightat Yasmeen BSc Bed D/O Malak Bshir Ahmad	GGHS Tank	1990/620/ 1200/516/ 1987/453/	2.9.67/D.I.Khan	19.12.90	3.9.91	
20	Kneez Akhtar BA Bed D/O M.Pervez Khan	GGHS Kuzsaj D.I.Khan	1983/435/ 1000	D.I.khan	17.11.90	1.6.92	
21	Haseena Tsneem BA Bed D/O Rahim Shah	GGHSS Comp.Peshawar	1987/423/ 1000	Swabi	30.1.91	23.2.93	
22	Husan Afroz MA Bed D/O Akhtar Ali	GGHS Takht Nasrati Karak	1987/18/ 1200/598/ 1986/460/ 1000	9.11.54/Bannu 1.4.63/Kohat	7.2.91 8.1.91	23.2.93 23.2.93	
23	Kaneez Fatema BA Bed D/O Syed Main Shah	GGHS Hangu	1986/460/ 1000	12.12.57/H.Pu	12.91	23.2.93	
24	Imtiaz Bibi BA Bed D/O Muhammad Sadiq	GGHS Baghra Haripur	1986/452/ 1000	1.12.57/Mansehra	4.2.91	23.2.93	
25	Shahida Sharif BA Bed Muhammad Sharif	GGHS Serf Kot Mansehra	1988/450/ 1000	15.3.59/A.Abad	29.1.91	23.2.93	
26	Robina Gul BA BED D/O Sahib Zada Abdul Milk	GGHS Comper.A.Abad	1988/440/ 1000	10.5.78/A.Abad	1.2.91	23.2.93	
27	Naseem Jan Abasi MA Bed D/O Muhammad Amir Khan	GGHS Comper.A.Abad	1989/435/ 1000	31.8.63/Swal	24.1.91	23.2.93	
28	Naseem Akhtar BA Bed D/O Muhammad Said	GGMS Behin Swat	1989/429/ 1000s	18.2.62/Dir	24.1.91	23.2.93	
29	Tohida Begum BSc Bed D/O Shabir Rehman	GGHS Ziarat Talash Dir (L)	1990/649/ 1000	12.4.63/Abad	21.1.91	23.2.93	
30	Sameena Mushtaq MSc Bed D/O Mushtaq Hassan Shah	GGHS Panian A.Abad	1990/640/ 1000	17.7.67/Mardan	3.2.91	23.2.93	
31	Imtiaz Perveen BSc Bed D/O Noor-ul Basshar	GGHS Pir Pai NSR	1990/615/ 1000	10.8.63/Kohat	9.2.91	23.2.93	
32	Tiat MSc BED D/O Hasimat Ali	GGHS Serf Kohat	1990/604/ 1000	2.1.67/Peshawar	24.1.91	23.2.93	
33	Yasmeen Akhtar BSc BED D/O Syed Muhammad Akhars	GGHSS Ledl Gfif Peshawar	1990/600/ 1000s	15.3.65/A.Abad	21.1.91	23.2.93	
34	Gul Naz Bibi BSc Bed D/O Muhammad Sadiq	GGHS Sira Naimat Khan	1990/567/ 1000	15.4.56/Swabi	25.1.91	23.2.93	
35	Shulqat Begum MSc Med D/O Abdul Qayum	GGHS Hayatabad Peshawar	1990/562/ 1000	22.4.67/A.Abad	21.1.91	23.2.93	
36	Murhda Habib.SET. BSc Bed D/O Habib-ur-Rehman	GGHS S.N.Khan Haripur.	1990/534/ 1000	10.6.54/Swal	30.1.91	23.2.93	
37	Irum Bano BA Bed D/O Raza Khn	GGMS Jano Swt	1990/515/ 1000	13.4.52/Dir	25.1.91	23.2.93	
38	Bibi Surjeda BA BED D/O Abdul Haqi Khan	GGHS Och Dir	1000				



S.No.	Name /Father Is Name/ Qualifications	School	Year of Passing B.Ed	Date of Birth / Domicile	Date of Ist Apptt. in Edu Deptt.	TD/O Apptt / Approval of SET Post	Remarks
1	2	3	4	5	6	7	8
539	Shaghufia yasmnin, SET, MA Bed	GGHS, Afzal Abad Mansehra	1990	13.4.65/Haripur	10.9.85	25.3.96	
540	Safura yasmnin, SET	GGMS, Lahnol gate Pesh: ST 205	1990	28.2.61/Peshawar	27.10.85	25.3.96	
541	Shaukal perveen, SET, MA Bed	GGHS, Topi, Swabi	1990	1.5.65/Peshawar	2.11.85	25.3.96	
542	Azra Begum, SET, MA, Bed	GGMS, Jalsai swabi	1990	14.5.65/Charsadda	1.2.88	25.3.96	
543	Bibi nargis, SET, MA, Bed	GGHS, Afzal Abad Mansehra	1990	12.7.63/Mansehra	7.5.86	25.3.96	
544	Nazneen Begum, SET, MA Bed D/O Muhammad	ASDEO(F)Swabi	1990	1.1.65/Charsadda	10.12.86	25.3.96	
545	Sania Farid, SET, MA, Bed	GGHS.	1990	10.8.66/Mansehra	21.10.86	25.3.96	
546	Shahveen Akhtar, SET, MA Bed	GGHS, Saikote haripur	1990	18.4.67/Haripur	10.1.91	25.3.96	
547	Wajida Siddique, SET, MA Bed	GGHS, Ghazi Haripur	1990	12.11.57/Haripur	19.11.83	25.3.96	
548	Najmun Nisa, SET, MA Bed	GGHS, Lora A. Abad	1990	11.5.61/A. Abad	3.11.82	25.3.96	
549	Shahida Khatloon, SET, MA Bed	GGHS, Rich bhen A. Abad	1990	8.11.61/A. Abad	1.12.83	25.3.96	
550	Fatmat Abbasi, SET, MA Bed	GGMS, Bakote A. Abad	1990	4.4.62/A. Abad	10.12.83	25.3.96	
551	Rashida begum, SET, MA Bed	GGHS, Seer A/Abad	1990	1.4.65/Mansehra	17.4.85	25.3.96	
552	Farah naz, SET, MA Bed	GGHS, Darband Mansehra	1990	13.4.63/A. Abad	30.9.85	25.3.96	
553	Saeeda Shamin, SET, MA Bed	GGHS, Hajia Gall A. Abad	1990	31.8.61/a/Abad	23.6.87	25.3.96	
554	Falak Naz SET, MSc; Bed	GGHS, S Katta A/Abad	1990	23.5.89/A/Abad	21.9.89	25.3.96	
555	Ghazala Yasmin, SET, MA Bed	GGMS, Jabri Haripur	1990	1.5.65/Haripur	1.9.85	25.3.96	
556	Shahida Nasreen, SET, MA Bed	GGMS, Kakoti Haripur	1990	29.6.63/A. Abad	1.9.86	25.3.96	
557	Azra Sulana, SET, BA, Bed	GGMS, Ali Abad A/Abad	1990	15.3.64/Haripur	29.9.86	25.3.96	
558	Tazeem Akhtar, SET, MA Bed	GGMS, Mohri bed ben, A/Abad	1990				

S.No.	Name /Father Is Name/ Qualifications	School	Year of Passing B.Ed	Date of Birth / Domicile	Date of Ist. Apptt. in Edu. Deptt.	D/o Apptt / Approval of SET Post	Remarks
1	2	3	4	5	6	7	8
559	Fozia Barlas, SET BSc/Bed	GGHS, Kulachi DIK	1990	1.9.68/DIK	24.11.88	25.3.96	
560	Ishad Bibi, SET, BA Bed	GGHS, Kamber, Dir	1991	1.1.57/Chitral	31.10.85	25.3.96	
561	Shahen Akhtar, SET, BA Bed	GGHS, Samand Khan Killi FR Peshawar	1991	8.10.61/NWA	8.11.86	25.3.96	
562	Farzana Bano, SET, MA Bed.	GGHS	1992	5.1.59/Peshawar	11.3.78	25.3.96	
563	Nusrat Perveen, SET, MA Bed	GGMS, Kalpani, Bunit	1992	15.6.62/Bunit	18.7.85	25.3.96	
564	Tajjala Begum, SET, BSc, Bed	GGHS, Shabqadar Chd.	1992	1.4.61/Charsadda	1.3.88	25.3.96	
565	Farzana Begum, SET, MA Bed	GGHS, Landi Ashraf Pesh.	1992	4.3.64/Swat	8.11.90	25.3.96	
566	Roshan Ara, SET, BSc, Bed	GGHS, Mulazai DIKhan	1992	15.4.69/DIK	26.5.95	25.3.96	
567	Narjias Khatoon, SET, Bsc, Bed	GHSS, S. Naurang Bannu	1992	1.5.69/DIK	26.5.95	25.3.96	
568	Kalsoon, SET, BA, Bed	GGHS, Koto Dir	1993	15.10.70/Dir	30.7.95	25.3.96	
569	Naz Perwar, SET, MA Bed	GGMS, Shana Ghundi M.Agy	1993	8.2.67/M.Agy.	20.4.85	25.3.96	
570	Rozina Imtiaz, SET, Bsc Bed	GGHS, Choriwala Bannu	1993	5.9.67/D.I.Khan	13.12.92	25.3.96	
571	Bibi Aisha, SET, MA, Bed	GGHS, Kumber Dir	1993	3.4.67/Chitral	4.9.86	25.3.96	
572	Bibi Latifa, SET, MA Bed	GGMS, Booni Chitral	1993	5.2.59/Chitral	1.12.82	25.3.96	
573	Mussarat Jehan, SET, MA Bed	GGHSS, Timargara Dir	1993	15.12.55/Dir	25.7.83	25.3.96	
574	Nusrat Perveen, SET, BA Bed	GGHS, Samarbagh Dir	1993	28.10.64/Chitral	17.11.87	25.3.96	
575	Yasmin Begum, SET, BA Bed	GGMS, Manyal, Dir	1993	2.2.70/Malakand	20.9.89	25.3.96	
576	Fazlial SET, BA Bed	GGMS, Faleh Pur Swat.	1993	30.4.69/Swat	28.9.89	25.3.96	
577	Kishwar sultana, SET	GGMS, Tolakan Malakand	1993	15.4.70/Malakand	11.4.88	25.3.96	
578	Fehmida begum, SET,	GGMS, Khazana Dir	1993	12.6.66/Dir	13.7.85	25.3.96	

S.No.	Name /Father Is Name/ Qualifications	School	Year of Passing B.Ed	Date of Birth / Domicile	Date of Ist. / Apptt. in Edu. Deptt.	D/O Apptt / Approval of SET Post	Remarks
1							
1729	Saeeda Begum D/o Hazrat Ali		4		6	7	8
1730	Ghazal Saeed D/o Khan said						
1731	Sakina Nawab D/o Haji Nawab Ali			02.05.1984Moh Agy			
1732	Hajira D/o Faqir Muhammad						
1733	Hoda Ahmed D/o Ahmed gull						
1734	Nasim Orakzai D/o Syed Khan Orkazai						

  
 Deputy Director (Female)  
 (E&SE) Khyber Pukhtunkhwa  
 Peshawar.

**FINAL SENIORITY LIST FOR SETS RELATIVE OF ELEMENTARY AND SECONDARY**  
 4/23/17/2011


JINKHYA STOOD ON

*Decision*  
 15/1/2011

S.No.	Name / Father's Name / Qualifications	School	Pay B. Ed Nতির	Dom.	Date of Ist. Appt. in Edu/Dept.	D/O Appt / Approval of SET Post	Remarks
1	Amwar Sultan SET BA B.ED D/O Abdol Hagan	GGHS Dargai Malakand	1554/400/1 000	5	27.4.1948	03.1968	8 Absent
2	Kausar Nabeed MSc B Ed D/O Shahzad	ASDEO/PC/CD	1554/442/1 000	23.8.56/Peshawar	9.12.85	2.10.53	
3	Amul Basil BA B.ED P.O Zia-ur-Raza	GGHS Jareed Mansehra	1553/529/1 000	7.7.59/Manshra	12.11.65	13.12.53	Transferred to /
4	Nighat Yasmeen BA B Ed D/O Mubtahir Yusuf	GGHS No2 A Abad	200/536/10 00	8/4.63/A Abad	2.6.63	13.12.53	
5	Zahida Yasmeen EA Bed D/O S>G>M Mansha Shah	GGHS Kaili Wan F.R.O.I Khan	00	D.I Khan		14.12.53	PTD
6		GGHS Manshra	000	30.4.58/A Abad	11.10.61	14.12.53	
7	Shamim Bibi BA BEO S/O Abdol Raza	GGHS Bahara Kanak	1554/454/3/1 000	Bannu		20.12.53	
8	Rahana Kausar BA B Ed D/O Muzia Akter	GGHS Kot Wali A Abad	200/310/10 00	A Abad		21.12.53	
9	Kudjin Saha DSc UoD D/O Soma Bandyop	GGHS Haji Gali A Abad	1553/509/1 000	Manshra		21.12.53	
10	Lubna Tusam BSc Bed D/O Fajar Hossain	GGHS Umangra	1553/502/1 000	10/4 B/Peshwar		21.12.53	
11	Hajrat Yameen DA BSc D/O Hina Hameed Gandapur	ASD-3 F D I Khan	200/619/10 00	22/4 GOND I Khan		21.12.53	
12	Shahkora Yasmeen LSc Bed D/O Azaiz Zahara S	GGHS Shikandara Kohat	1553/550/1 000	1/6 GOND I Khan	6.6.83	23.12.53	On leave
13	Naz Perveen SET BA B.ED	GGHS Jhangir Nura Posh	1999	12.3.92/Peshwar	4.5.85	02.04.53	11/11
14	Fatoh Naz SET MSc EED	GGHS S Kalra A/Abad	1990	31.8.61/A/Abad	23.6.57	03.11.93	Shifted from Sec
15	Zakia Begum SET BA B.ED	GGHS No 1 Sial Horgan Laya	1990	15.02.1951	01.01.1997	09.11.93	Double up with 2/10
16	Mehmooda Suliana MSc Bed D/O Sultan Bahadar	GGHS Sirkol Haripur	1553/475/1 000		3.10.85	26.11.93	
17	Parveen Akhtar BA BEO D/O Khan Gacistan	GGHS Thal Nerrail	1553/422/1 000	15.06.1961/Kohat		26.11.93	
18	Fatmat Jehan BA BEO D/O Saif Shah	GGHS Swabi	1553/521/1 000	7.2.60/Mardan	9.12.82	26.11.93	
19	Vedolika Nabeed BA BEO D/O Raja Malik	GGHS Dak Besud NSR	1553/459/1 000	16.62/Peshawar	18.3.93	26.11.93	

S.No.	Name /Father's Name/ Qualifications	School	Year of Passing BEd /Rent	Date of Birth / Domicile	Date of let: Appt. in Edu. Deptt:	Dir Appt Approval of SET Post:	Remarks
1	2	3	4	5	6	7	8
603	Shaher Ashraf, SET, BA, BEd	GGHS, Samand Khan (Vill) FR Peshawar	1991	8.10.1970	8.11.86	25.3.95	
604	<del>Khazana Begum, SET, MA, BEd</del>	<del>GGHS, ...</del>	<del>1992</del>	<del>5.1.55</del>	<del>11.3.78</del>	<del>25.3.95</del>	
610	Musrat Parveen, SET, MA, BEd	GGHS, Kalpani, Bunit	1992	15.6.72	18.7.85	25.3.95	
611	Tajjala Begum, SET, BSc, BEd	GGHS, Shahbadar Chd.	1992	14.7.54	1.3.89	25.3.95	
612	Hamida Shah, SET, MSc, BEd	GGHS, Landi Abbub Pesh.	1992	4.3.54	8.11.90	25.3.95	
613	<del>Reshma ... SET ...</del>	<del>...</del>	<del>1992</del>	<del>15.4.54</del>	<del>26.5.95</del>	<del>25.3.95</del>	
614	Khajra Khatun, SET, BSc, BEd	GGHS, S. Naurang Bannu	1992	1.5.54	26.5.95	25.3.95	
615	Kalsoom, SET, BA, BEd	GGHS, Kala Dir	1992	15.10.54	30.7.95	25.3.95	
616	Naz Perwar, SET, MA, BEd	GGHS, Shana Ghundi (Vill) Foy	1993	8.2.54	20.4.85	25.3.95	
617	Rozina Khatun, SET, BSc, BEd	GGHS, Ghoriwala Bannu	1993	5.9.54	13.12.92	25.3.95	
618	Bibi Abeer, SET, MA, BEd	GGHS, Kumbhar Dir	1993	3.4.54	4.9.86	25.3.95	
619	Bibi Latifa, SET, MA, BEd	GGHS, Ghoni Chitral	1993	5.2.54	1.12.82	25.3.95	
620	Mussarat Jehan, SET, MA, BEd	GGHS, Tamergara Dir	1993	15.11.54	25.7.83	25.3.95	
621	Musal Perveen, SET, BA, BEd	GGHS, Samanbagh Dir	1993	29.11.54	17.11.87	25.3.95	
622	Yasmin Begum, SET, BA, BEd die Sharam Khan	GGHS, Quail Darya Miko	1992	2.2.72	20.9.89	25.3.95	
623	Fazilat SET, BA, BEd	GGHS, Falah Pur Swat	1993	30.4.54	28.9.89	25.3.95	
624	Kashwar Sultana, SET, BA, BEd	GGHS, Tolakan Malakand	1993	15.4.72	11.4.88	25.3.95	
625	Fehmida Begum, SET, BA, BEd	GGHS, Khazana Dir (L)	1993	12.6.54	16.7.95	25.3.95	
626	Gul Nasreen, SET, MSc, BEd	GGHS	1993	1.5.64	29.10.95	25.3.95	
627	Noor Jehan Begum, SET, BA, BEd	GGHS, Rabat Dir (L)	1993	19.3.54	21.12.81	25.3.95	
628	Dahad Begum, SET, MA, BEd	GGHS, Malis Swat	1993	1.1.54	25.11.80	25.3.95	

S.No.	Name /Father's Name/ Qualifications	School	Year of Passing B.Ed /Merit	Date of Birth / Domestic	Date of Ist. Applt: in Edu:Deptt:	D/o Apptt / Approval of SET Post	Remarks
1763	Nighat Saema SET BA BEd D/o Zahir Shah		5	27.12.1982/FR Peshawar			8
1764	Khurshida Jan SET BA BEd D/o Habib Ali						
1765	Shahab un Nisa SET BA BEd D/o Muhammad Shamin Khan			25.02.1978/ok Agy			
1766	Syeda Ume salma SET BA BEd D/o Syed Anwar Shah			03.04.1983/FR Bannu			
1767	Shagufta Chaman SET BA BEd D/o Muhammad Younis			10.08.1981/ok Agy			
1768	Rakhsanda Samar SET BA BEd D/o Ghulam Samwar			28.09.1972/Baj' Agy			
1769	Bibi Zubra SET BA BEd D/o Sultan Ali Shah			12.04.1979/Moh Agy			
1770	Saeeda Begum SET BA BEd D/o Hazrat Ali			12.11.19769/Kurram Agy			
1771	Ghazal Saeed SET BA BEd D/o Khan Said			01.04.1983/Moh Agy			
1772	Sakina Nawab SET BA BEd D/o Muhammad			21.03.1978/Kurram Agy			
1773	Hajira SET BA BEd D/o Muhammad			28.11.1976/Moh Agy			
1774	Nadia Ahmad SET BA BEd D/o Ahmad Gul			02.02.1980/Moh Agy			
1775	Nasira Orakzi SET BA BEd D/o Syed Khan Orkazai			18.04.1980/Kurram Agy			

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