

S. No.	Date of Order or proceedings.	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	07.02.2017	<p style="text-align: center;"><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u> <u>CAMP COURT SWAT</u></p> <p style="text-align: center;">Service Appeal No. 543/2014</p> <p>Nasim Bibi Versus District Education Officer (Female) Bunir and others..</p> <p style="text-align: center;"><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:</u></p> <p>Counsel for the appellant, Mr. Muhammad Zubair, Senior Government Pleader for official respondents and counsel for private respondent No. 3 present.</p> <p>2. Nasim Bibi PSHT GPS Kankowai District Bunir hereinafter referred to as the appellant has preferred the instant service appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against impugned order dated 06.03.2014 vide which she was transferred to GGPS Badair from GPS Kankowai and where-against her departmental appeal was rejected on 11.04.2014.</p> <p>3. Learned counsel for the appellant argued that the said appellate order was in violation of rule-5 of civil servants (Appeal) Rules 1986. That according to the policy of the Provincial Government appellant was senior most and therefore entitled to be retained in the school of her posting.</p> <p>4. Learned senior Government Pleader as well as learned counsel for private respondent No. 3 argued that the private respondent No. 3</p>

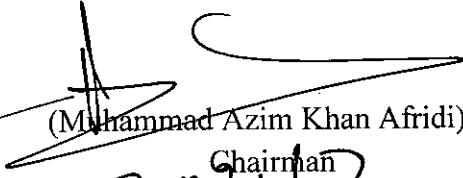
C
07.02.17

Mst. Bahija was senior to the appellant as her name was reflecting at S.No. 22 of the seniority list while that of the appellant at S.No. 116 and as such it was the private respondent No. 3 who was entitled to be retained in the said school.

5. We have heard arguments of learned counsel for the parties and perused the record.

6. Appellant was not found senior to private respondent No. 3 (Mst. Bahija) and as such appellant could not be extended the benefit of item No. 5 of the guidelines for posting of PSTs BPS-12 on promotion. The appeal is found devoid of merits and the same is therefore dismissed, leaving the parties to bear their own costs. File be consigned to the record room.


(Ahmad Hassan)
Member


(Muhammad Azim Khan Afridi)
Chairman
Camp Court, Swat.

ANNOUNCED
07.02.2017

06.12.2016

Counsel for the appellant, Mr. Mohsin, PST
alongwith Muhammad Zubair, Sr.GP for the respondents
present. The bench is incomplete, therefore, arguments
could not be heard. To come up for final hearing before
D.B on 04.01.2017 at camp court, Swat. The restraint
order shall continue.

04.1.2017

Agent of counsel for the appellant, Mr. Muhammad Zubair,
Senior Government Pleader for official respondents and counsel for
private respondent No. 3 present. Counsel for the appellant is not in
attendance as he has gone to Karachi. Adjourned for rejoinder and final
hearing to 07.02.2017 before D.B at camp court, Swat. The restraint
order shall continue.

Member


Chairman
Camp court, Swat

543/2014

07.06.2016

Counsel for the appellant, Mr. Ubaidur Rahman, ADO alongwith Mr. Muhammad Zubair, Sr.GP for official respondents and Mr. Muhammad Tayyab, brother of private respondent No. 3 present. Counsel for private respondent No. 3 has not turned up from Peshawar. Requested for adjournment. To come up for final hearing 07.09.2016 before D.B at camp court, Swat. Status quo be maintained.


Member


Chairman
Camp court, Swat.

07.09.2016

Counsel for the appellant, Mr. Muhammad Zubair, Sr.GP for the official respondents and brother of private respondent No. 3 present. Requested for adjournment as counsel for private respondent No. 3 is not turned up from Peshawar. Adjourned for final hearing before the D.B on 04.10.2016 at camp court, Swat. The restraint order shall continue.


Member


Chairman
Camp Court, Swat

04.10.2016

Counsel for the appellant, Mr. Muhammad Zubair, Senior Government Pleader for the official respondents and brother of private respondent No. 3 present. Counsel for private respondent No. 3 is not in attendance. Seeks adjournment. Adjourned for final hearing to 06.12.2016 before the D.B at camp court, Swat The restraint order shall continue.


Member


Chairman
Camp court, Swat

02.02.2016

Mr. Anwar Zaib, Husband of the appellant, Mr. Muhammad Zubair, Sr.G.P for official respondents No.1 and 2 and Mr. Tayyab, Brother of private respondent No.3 present. Counsel for private respondent No.3 is not in attendance. Requested for adjournment. To come up for final hearing before D.B on 08.03.2016 at Camp Court Swat. Status-quo be maintained.

Member,

Chairman
Camp Court Swat

08.03.2016

Mr. Sultan Zeb on behalf of the appellant, Mr. Amir Qadir, G.P for official respondents No.1 & 2 and agent of counsel for private respondent No.3 present. Due to non-availability of D.B as well as strike of the Bar arguments could not be heard. To come up for final hearing before D.B on 04.4.2016 at Camp Court Swat. Status-quo be maintained.

Chairman
Camp Court Swat

04.04.2016

Counsel for the appellant, Mr. Anwarul Haq, GP for the official respondents and counsel for private respondent No. 3 present. Due to non-availability of D.B arguments could not be heard. To come up for final hearing before D.B on 07.06.2016 at Camp Court, Swat.


Chairman
Camp court, Swat.

19.06.2015

Notices be issued to the parties for arguments at Camp Court Swat on 9.9.2015 before D.B as the matter pertains to the territorial limits of Malakand Division.


Chairman


9.9.2015

 Counsel for the appellant, Mr. Muhammad Zubair, Sr.G.P for official respondents No.1 & 2 and Mr. Muhammad Tayab, brother of private respondent No.3 present. Due to non-availability of D.B, arguments could not be heard. To come up for final hearing before D.B on 9.12.2015 at Camp Court Swat.


Chairman
Camp Court Swat

9.12.2015

Mr. Anwar Zeb husband of the appellant, Mr. Amir Qadir G.P for official respondents No.1 & 2 and Mr. Fazal Hussain husband of private respondent No.3 present. Due to non-availability of D.B case is adjourned to 2.2.2016 for final hearing before D.B at Camp Court Swat.


Chairman
Camp Court Swat

27.03.2015

Counsel for the appellant, Mr. Muhammad Jan, GP with Hameed-Ur-Rehman, Ado for official respondents and Mr. Ashraf Ali Khattak, Advocate/counsel for private respondent No.3 present. Counsel for the appellant requested for adjournment. To come up for rejoinder and arguments on 12.05.2015. Till then status-quo is extended.


Member


Member

12/5.2015

Clerk of counsel for the appellant, Mr. Muhammad Jan, GP for the official respondents and counsel for private respondent No. 3 present. Application submitted on behalf of counsel for the appellant for adjournment due to his engagement in the Hon'ble High Court. Since status quo order is involved, therefore, case to come up for arguments on reasonable date i.e. 09.6.2015, by way of last opportunity to the parties to produce their counsel for arguments. Status quo is extended till the date fixed.


MEMBER


MEMBER

9.06.2015

Counsel for the appellant, Mr. Ziaullah, GP with Hameedur Rahman, AD for the official respondents and counsel for private respondent No. 3 present. Both the learned counsel for the appellant as well as private respondent No. 3 stated that the case pertains to territorial limits of Malakand Division and requested that the case may be fixed at Camp Court, Swat. This case be put before the Worthy Chairman for appropriate order.


MEMBER


MEMBER

5.11.2014.

Attorney for the appellant, Mr. Ziaullah, GP with Hameedur Rahman, ADO for official respondents present and written reply on main appeal filed. Copy handed over to attorney for the appellant. Clerk to counsel for private respondent No. 3 present and requested for further time. To come up for written reply of private respondent No. 3 on main appeal as well as reply/arguments on stay application on 29.12.2014. Till then status quo is extended.



MEMBER

29.12.2014

Clerk to counsel for the appellant and Mr. Muhammad Jan, GP with Hameedur Rahman, ADO for the official respondents and clerk to counsel for private respondent No. 3 present. The Tribunal is incomplete. To come up for the same on 09.2.2015.



READER

9.2.2015

Clerk of counsel for the appellant, Mr. Muhammad Jan, GP with Hameedur Rahman, ADO for official respondents and Mr. Ashraf Ali Khattak, Advocate/counsel for private respondent No. 3 present. Official respondents have already filed written reply and written reply on behalf of private respondent No. 3 received to-day, copy whereof is handed over to clerk of counsel for the appellant. To come up for rejoinder and arguments on 27.3.2015. Till then status quo is extended.



MEMBER

15.07.2014

Counsel for the appellant and Mr. Muhammad Jan, GP present. None is available on behalf of the respondents despite proper service nor their written reply received; therefore, arguments on stay application could not be heard. Fresh notices be issued to the respondents for submission of written reply on main appeal as well as reply/arguments on stay application on 15.08.2014. Official respondents are directed to maintain status quo till the date fixed.


MEMBER


MEMBER

15.08.2014

Junior to counsel for the appellant, Mr. Muhammad Jan, GP and brother of private respondent No. 3 present and requested for time to engage counsel and submit proper of attorney. Notices be issued to respondents No. 1 & 2. To come up for written reply on main appeal as well as reply/arguments on stay application on 19.09.2014. Till then status quo is extended.


MEMBER

19.09.2014

Counsel for the appellant, Mr. Muhammad Adeel Butt, AAG with Sajjad Rashid, AD for respondent No. 2 present and requested for time. Mr. Ashraf Ali Khattak, Advocate appeared on behalf of private respondent No. 3 and requested for time to submit proper wakalatnama and written replies on the next date, Notice be issued to official respondents No. 1. To come up for written reply on main appeal as well as reply/arguments on stay application on 05.11.2014. Till then status quo is extended.


MEMBER

Appeal No. 543/2014.
Mst. Nuzim Bibi.

3.

19.05.2014

Counsel for the appellant present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the original order dated 06.03.2014, she filed departmental appeal, which has been rejected on 11.04.2014, hence the present appeal on 17.04.2014. He further contended that the impugned order dated 11.04.2014, has been issued in violation of Rule-5 of the Civil Servant (Appeal) Rules 1986. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. Counsel for the appellant also filed an application for suspension of impugned office /notification dated 06.03.2014. Notice of application should also be issued to the respondents for reply/arguments. To come up for written reply/comments on main appeal on 15.08.2014 as well as reply/arguments on application on 03.06.2014.

Appellant deposited
process fee & security
Rs. 1800/- Bante Receipt
attached with file

4.

19.05.2014

This case be put before the Final Bench II for further proceedings.

Member

Chairman

03.6.2014

Counsel for the appellant and Mr. Muhammad Jan, GP with Sajjad Rashid, AD for respondent No.2 present and requested for time. None is available on behalf of respondents No.1 & 3. Fresh notice be issued to them. To come up for reply/arguments on stay application on 15.7.2014.

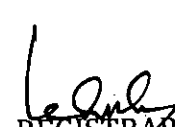
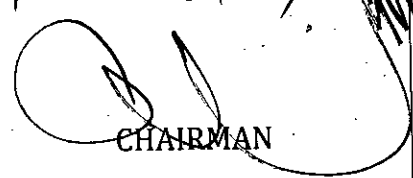
MEMBER

MEMBER

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 543/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	17/04/2014	<p>The appeal of Mst. Nasim Bibi presented today by Mr. Shams ul Hadi Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p> REGISTRAR</p>
2	21-4-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>19-5-2014</u></p> <p> CHAIRMAN</p>

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. 543 /2014

Nasim BiBiAppellant

V E R S U S

District Education Officer (Female) Bunir

and othersRespondents

INDEX

S.No	Description of Documents	Annex	Pages
	Memo of Appeal		1---4
	Stay application along with Affidavit		5---7
	Addresses of the Parties		8
	Copies of Office orders dated:01.10.2013 and 05.10.2013.	A	9--10
	Copy of impugned office order dated:06.03.2014	B	11
	Copy of departmental Appeal and office order dated:11.04.2014	C	12--13
	Wakalat Nama		14

Appellant

Through

Shams ul Hadi

Advocate, Peshawar.

Office: St/3 Abshar Colony

Warsak Road Peshawar.

Cell No. 0313-9772262

Dated: 15/04/2014

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 543 /2014.

578
17-4-14

Nasim Bi Bi (PSHT)

Presently posted at GPS Kankowai Tehsil Mandanr

District Bunir.....Appellant

V E R S U S

- 1. District Education Officer (Female) Bunir.
2. Director S&E Education, KPK, Civil Secretariat Peshawar.
- 3. Bahija (PSHT)

Presently posted at GPS Badai, Tehsil Mnadanr

District Bunir.....Respondents

**APPEAL UNDER SECTION 4 OF KHYBER
PUKHTUNKHWA SERVICE TRIBUNAL ACT
1974 AGAINST THE IMPUGNED OFFICE
ORDER DATED:06.03.2013 AND 11.04.2014
PASSED BY RESP No.1.**

Le Sub
17/4/14

PRAYER IN APPEAL:

On acceptance of this appeal the impugned Office Order No.8026-28 dated:06/03/2014 and 11.04.2014 may kindly be set aside and the appellant may kindly be allow to continue/perform his services against the post PSHT at GPS Kankowai.

Respectfully Sheweth:

1. That initially the appellant joined the respondent/department since long and as such performing her duties with zeal and zest and till date no compliant what so ever has been recorded from any quarter .
2. That prior the impugned order the appellant was transferred to GPS Badair from GPS Kankowai vide order dated:01.10.2013 against which the appellant approached the concerned authority and as such same order was cancelled vide 05.10.2013.(Copies of the office orders dated:01.10.2013 and 05.10.2013 are annexure-A)
3. That latter on the reasons best known to the respondent No.1 again the appellant was transferred to GPS Badair from GPS Kankowai vide impugned office order

dated:06.03.2014 which clearly showing the ill intention of the respondents towards appellant.(Copy of impugned office order dated:06.03.2014 is annexure-B)

4. That against the said order the appellant filed departmental appeal before the competent authority which was regretted vide office order dated:11.04.2014.(Copies of departmental appeal and office order dated:11.04.2014 are annexure C)

So being aggrieved the appellant filed the instant appeal before this Hon;ble Tribunal on the following grounds amongst others inter alia:

GROUND:

- A. That the impugned Transfer order dated:06/03/2014 is against facts, law and procedure, hence, untenable being unjust and unfair.
- B. That the appellant was not treated in accordance with law and rules, thus acted in violation of the relevant laws laid down for the purpose.
- C. That subsequent transfer orders clearly showing the ill intention of the respondents and such like illegal actions

and inactions are classical examples of political victimization because the appellant was penalized and transferred contrary to the commitments made by the department with appellant.

- D. That any other ground may be adduced during the course of argument, with the kind permission of this Hon'ble Court.

It is, therefore, most humbly prayed that on acceptance of this appeal the impugned Office Order dated:06.03.2014 and 11.04.2014 may kindly be set aside and the appellant may kindly be allow to continue/perform his services against the post of PHST at GPS Kankowai, District Bunir.

Appellant



Nasim BiBi

Through



Shams ul Hadi

Advocate, Peshawar.

Dated: 15/04/2013

**BEFORE THE SERVICES TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR.**

Service Appeal No. _____/2014

Nasim BiBiAppellant

V E R S U S

District Education Officer (Female) Bunir

and othersRespondents

Application for Suspension of impugned office order/Notification dated:06.03.2014 and further to allow the applicant to perform his duties against the post of PHST at GPS Kankowai (Bunir) till final disposal of the titled appeal .

Respectfully Sheweth:

1. That the appellant/petitioner filed instant application along with service appeal in which no date is fixed so for.
2. That facts and grounds of the appeal may kindly be considered part and parcel of this application.
3. That prima facie the appellant has good case and is sanguine about its success because the applicant was transferred to

various places in a short span of time and as such the respondents violated the rules & Posting /Transfer policy.

4. That if the impugned Notification dated:06.03.2014 is not suspended at this stage the appellant will suffer irreparable loss.

So on acceptance of this application the impugned Notification dated:06.03.2014 may kindly be suspended and the applicant may kindly be allow to perform his duties against the post of PHST at GPS Kankowai Bunir till final decision of the titled appeal.

Applicant

Through



Shams-ul- Hadi
Advocate High Court

7

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2014

Nasim BiBiAppellant

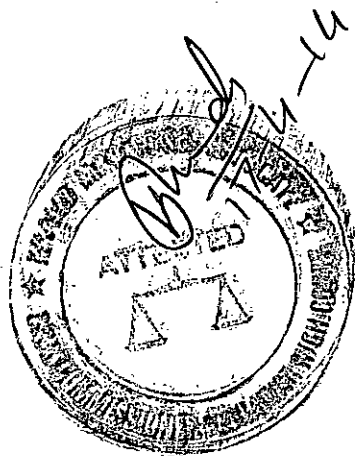
V E R S U S

District Education Officer (Female) Bunir

and othersRespondents

AFFIDAVIT

I, **Shams ul Hadi**, Advocate, Peshawar do hereby as per information conveyed to me by my client solemnly affirm and declare that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



A D V O C A T E

8

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2014

Nasim BiBiAppellant

V E R S U S

District Education Officer (Female) Bunir

and othersRespondents

ADDRESSES OF THE PARTIES

APPELLANT:

Nasim Bi Bi (PSHT) Presently posted at GPS Kankowai Tehsil
Mandanr District Bunir

RESPONDENTS:

1. District Education Officer (Female) Bunir.
2. Director S&E Education, KPK, Civil Secretariat Peshawar.
3. Bahija (PSHT) Presently posted at GPS Badai, Tehsil Mnadanr
District Bunir

Appellant

Through



Shams ul Hadi
Advocate, Peshawar.

Dated: 15/04/2014

9

Amra

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BUNER.

OFFICE ORDER

Consequent upon the proposal submitted by SDEO (Primary) in connection of appeals and approval of competent authority, the following PSHTs (F) BPS 15 are hereby adjusted transfer at the school against their names with immediate effect in the interest of public service.

No.	Name of Employee	U/C	Pervious School	Proposed School	BPS	Sen/ No	Remarks
	Bakhtia	Gagra	GGPS Bajkat 1	GGPS Dewana Baba.1	15	26	V/S.No.2
	Shakeela Naz	Gagra	GGPS Dewana Baba No.1	GGPS Barjobiandara	15	52	V/S.No.3
	Khalida	Gagra	GGPS Barjobiandara	GGP Tangora	15	160	V/S.No.4
	Dulhaja	Gagra	GGPS Tangora	GGPS Reyat	15	138	V/S.No.1
	Sadia Begum	Shalbandi	GGPS Shalbandi No.1	GGPS Shaibandi No.2	15	44	V/S.No.6
	Noor Jahan	Shalbandi	GGPS Nara	GGPS Shalbandi No.1	15	27	V/S.No.5
	Zuhra	Shalbandi	GGPS Shalbandi No.2	GGPS Nara	15	140	V/S.No.8
	Kalsoom Akhtar	Shalbandi	GGPS Gumbat	GGPS Parshalay	15	168	V/S.No.9
	Hidayat	Shalbandi	GGPS Parshalay	GGPS Gumbat	15	206	V/S.No.8
	Kaiat	Karapa	GGPS Mula Yusuf	GGPS Maradu	15	136	V/S.No.11
	Zebun Nisa	Karapa	GGPS Maradu	GGPS Mula Yusuf	15	141	V/S.No.10
	Bahja	Kayga	GGPS Badair	GGPS Konkowai	15	22	V/S.No.13
	Nasim Bibi	Kayga	GGPS Konkowai	GGPS Badair	15	116	V/S.No.12
	Sajmul Huda	Makhranai	GGPS Khanano Dherai	GGPS Gharib Abad	15	56	V/S.No.15
	Fajnu Kausar	Makhranai	GGPS Gharib Abad	GGPS Khanano Dherai	15	145	V/S.No.14
	Mushim Jehan	Chinglai	GGPS Dandi Kot	GGPS Kass Koroona No.2	15	51	V/S.No.17
	Lailun Nihar	Totalai	GGPS Kass Koroona No.2	GGPS Dandi Kot	15	93	V/S.No.16

(ZAIB-UN-NISA)

DISTRICT EDUCATION OFFICER (F) BUNER

Order No. 7218-2/1 Dated 1-10-2013. Forwarded for information to the; Primary Buner. Officers Concerned.

DISTRICT EDUCATION OFFICER (F) BUNER

10

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE BUNER

OFFICE ORDER

The transfer orders issued vide this office Endost No 7218-21 dated 1/10/2013 regarding PSHTs BPS-15 and order Endst No 7222-25 dated 1/10/2013 regarding SPSTs BPS 14 are hereby cancelled with immediate effect in the interest of Public service.

Note:


1-Charge report should be submitted to all concerned.

(ZAIB-UN-NISA)
DISTRICT EDUCATION OFFICER
FEMALE BUNER.

Endst: No: 7301-3 date: 1/10/2013

Copy forwarded to the:

- 1- S.D.E.O (F) Primary buner.
- 2- Head Mistress Concerned.
- 3- Office file.


DISTRICT EDUCATION OFFICER
FEMALE BUNER.

ATTESTED

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 543/2014

Nasim Bi Bi.....Appellant

V E R S U S

DEO(F) Bunir and others.....Respondents.

REJOINDER ON BEHALF OF APPELLANT.

Respectfully Sheweth:
On Preliminary Objections:
Para 1 to 6 are incorrect.

FACTS:

Para No. 1. needs no comments.

Para No.2 of the comments needs no comments.

Para No.3 of the reply is incorrect no committee was instituted to entertain appeals as they respondents have not annexed the minutes of the committee with his reply so the posting/transfer of the appellant was made on sweet will of the Resp No.1 which is illegal further before passing the impugned order the appellant was transferred to his present posting i-e GGPS Kankohy on the basis of promotion and that order too was illegal because the appellant belongs to Union Council Nawagy and she was transferred/adjusted in Union Council Kankoi without caring for promotion policy because junior teachers from appellant were not adjusted to other places and this fact was highlighted by the appellant in his departmental appeals. And according to promotion policy the Respondent No.3 should have been adjusted to his own union council.(Copy of Promotion Policy is attached)

Para No. 4 is also incorrect as the appellant filed his departmental appeal according to law and rules and the his appeal was dismissed illegally because on hand the departmental appeal was not forwarded to competent authority for proper decision and on other no sound and legal order was passed by the Resp No.1 according to section-4 (2) and Sec -5 of Khyber Pakhtunkhwa Civil Servant (Appeal) Rules ,1986. So this point alone is sufficient for acceptance of the service of the appellant.(Copies Rules are attached)

GROUND:

Para-A of Grounds is incorrect because the impugned order is not according to rules and policy. *(Copy of policy is attached)*

Para -B of grounds is also incorrect.

Para-C of grounds is incorrect because successive transfer orders in short period clearly showing the ill intention of the respondents and the same are classical example of political victimization.

Para-D of grounds needs no comments.

It is, therefore prayed that on acceptance of this rejoinder this Hon'ble Tribunal may be pleased to accept the appeal of the appellant as prayed for.

Appellant

Through



Shams-ul-Hadi
Advocate High Court,

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 543/2014

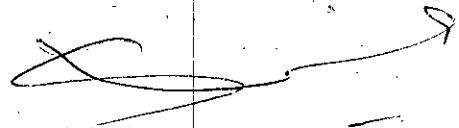
Nasim Bi Bi.....Appellant

V E R S U S

DEO(F) Bunir and others.....Respondents.

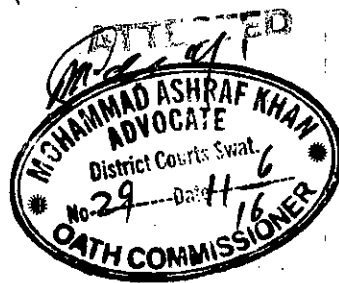
AFFIDAVIT

I, Shams-ul Hadi Advocate as per information conveyed to me by my client, do hereby solemnly affirm and declare that the contents of the **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

No 29
11-6-16



Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986

[Gazette of Khyber Pakhtunkhwa, Extraordinary, Page No. 1290-1293, 2nd June, 1986]

No. SORII (S&GAD) 3(4)/78 (Vol. 11).---In exercise of the powers conferred by section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, (Khyber Pakhtunkhwa Act XVIII of 1973), read with section 22 thereof, the Governor of the Khyber Pakhtunkhwa is pleased to make the following rules, namely:--

1. Short title, commencement and application.---(1) These Rules may be called the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986.

(2) They shall come into force at once and shall apply to every person who is a member of the civil service of the Province or is the holder of a civil post in connection with the affairs of the Province and shall also apply to or in relation to a person in temporary employment in the civil service or post in connection with the affairs of the Province.

2. Definitions.---In these rules, unless there is anything repugnant in the subject or context;

- (a) "Appellate Authority" means the officer or authority next above the competent authority;
- (b) "Competent Authority" means the authority or authorised officer, as the case may be, as defined in the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 1973, or the authority competent to appoint a civil servant under the rules applicable to him; and
- (c) "Penalty" means any of the penalties specified in rule 4 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 1973.

3. Right of Appeal.---(1) A civil servant aggrieved by an order passed or penalty imposed by the competent authority relating to the terms and conditions of his service may, within thirty days from the date of communication of the order to him, prefer an appeal to the appellate authority:

Provided that where the order is made by the Government, there shall be no appeal but the civil servant may submit a review petition:

[Provided further that the appellate or the reviewing authority, as the case may be, may condone the delay in preferring the appeal or the review petition, if it is satisfied that the delay was for the reasons beyond the control of the appellant or that the earlier appeal or review petition was not addressed to the correct authority.]

Explanation.---For the purposes of the first proviso, the expression "appeal" where the context so requires, shall mean the "review petition" as well.

(2) Where the order of the competent authority affects more than one civil servant, every affected civil servant shall prefer the appeal separately.

(3) Where the aggrieved civil servant has died, the appeal may be filed, or if already filed by such civil servant before his death, may be pursued, by his legal heir or heirs; provided that the benefit likely to accrue on the acceptance of such appeal is admissible to such legal heir or heirs under any rules for the time being applicable to civil servants.

4. Form of Memorandum.---(1) Every memorandum of appeal shall--

- (a) contain full name and address, official designation and place of posting of the appellant;
- (b) state in brief the facts leading to the appeal;
- (c) be accompanied by a certified copy of the order appealed against and copies of all other documents on which the appellant wishes to rely.

Explanation.---Where an aggrieved civil servant has died, his legal heir or heirs, while filing the appeal or applying for review, as the case may be, shall also add documents in support of his or their relationship with the deceased civil servant.

(2) The appeal shall be submitted through the Head of the office in which the appellant is posted at the time of filing the appeal, or in the case of a deceased civil servant, where he was last posted before his death. The Head of the office shall forward the appeal to the competent authority, if he himself is not such authority and the competent authority shall after adding his own comments, if any, transmit the appeal to the appellate authority for necessary orders.

(3) No appeal shall be entertained if it contains abusive, disrespectful or improper language.

5. Action by the appellate authority.---(1) The appellate authority, after making such further inquiry or calling for such information or record or giving the appellant an opportunity of being heard, as it may consider necessary, shall determine--

- (a) whether the facts on which the order appealed against was based have been established;
- (b) whether the facts established afford sufficient ground for taking action; and
- (c) Whether the penalty is excessive, adequate or inadequate

and after such determination, shall confirm, set aside or pass such order as it thinks proper; provided that no order increasing the penalty shall be passed without giving the appellant an opportunity of showing cause as to why such penalty should not be increased.

(2) The competent authority against whose order an appeal is preferred under these rules shall give effect to any order made by the appellate authority and shall cause the order so passed to be communicated to the appellant without undue delay.

6. **Withholding of appeal in certain cases.**---An appeal be withheld by the competent authority if--

- (a) it is an appeal in a case in which no appeal lies under these rules; or
- (b) it does not comply with the requirements of rule 4; or
- (c) it is not preferred within the time limit specified in sub-rule (1) of rule 3 and no reason is given for the delay; or
- (d) it is addressed to an authority or officer to whom no appeal lies under these rules;

Provided that in every case in which an appeal is withheld, the appellant shall be informed of the fact and reasons for it.

Provided further that an appeal withheld for failure to comply with the requirements of rule 4 or clause (d) of this sub-rule may be resubmitted within thirty days of the date on which the appellant is informed of the withholding of the appeal and, if resubmitted properly in accordance with the requirements of these rules, shall be deemed to be an appeal under rule 3 and shall be dealt with in accordance with the provisions of these rules.

(2) No appeal shall be against the withholding of an appeal under this rule.

7. **Disposal of appeal.**---(1) Every appeal which is not withheld under these rules shall be forwarded to the appellate authority along with the comments by the competent authority from whose order the appeal is preferred.

(2) A list of appeals withheld under rule 6, with reasons for withholding them, shall be forwarded quarterly by the withholding authority to the appellate authority.

(3) The appellate authority may call for any appeal admissible under these rules which has been withheld by the competent authority and may pass such order thereon as it considers fit.

8. **Savings.**---Nothing in these rules shall operate to deprive any person of any right of appeal which he would have if these rules had not been made, in respect of any orders passed before they came into force.

9. **Pending appeals.**---All appeals pending immediately before the coming into force of these rules shall be deemed to be appeals under these rules.

10. **Repeal.**---The Khyber Pakhtunkhwa Civil Services (Punishment and Appeal) Rules, 1943, are hereby repealed.

Khyber Pakhtunkhwa Civil Servants Revised Leave Rules, 1981

[Gazette of Khyber Pakhtunkhwa, Part I, Page No. 151-160, 23rd December, 1981]

No. FD. SO (SR-IV) 5-54 / 80 (Vol:II) dated 17-12-1981.---In exercise of the powers conferred by section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act XVIII of 1973) and in supersession of this Department's Notification No. FD.SO(SR-IV) 1-17/78, dated the 20th November, 1979, the Governor of the Khyber Pakhtunkhwa is pleased to make the following rules namely:--

1. **Short title, commencement and application.**---(1) These rules may be called the Khyber Pakhtunkhwa Civil Servants Revised Leave Rules, 1981.

(2) They shall come into force at once.

(3) They shall apply to all Civil Servants under the rule making authority of the Governor except those who opted not to be governed by the Khyber Pakhtunkhwa Civil Servants Leave Rules, 1979.

2. **Admissibility of Leave of Civil Servant.**---Leave shall be applied for, expressed and sanctioned in terms of days and shall be admissible to a civil servant at the following rate and scale:--

(i) A civil servant shall earn leave only on full pay. It shall be calculated at the rate of four days for every calendar month of the period of duty rendered and credited to the leave account as "leave on fully pay" duty period of 15 days or less in a calendar month being ignored and those of more than 15 days being treated as a full calendar month, for the purpose. If a civil servant proceeds on leave during a calendar month and returns from it during another calendar month and the period of duty in either month is more than 15 days, the leave to be credited for both the incomplete months will be restricted to that admissible for one full calendar month only.

(ii) The provisions of clause (i) will not apply to vacation departments. A civil servant of a vacation department may earn leave on full pay as under:--

- | | | |
|-----|--|---|
| (a) | When he avails himself of vacation in a calendar year. | At the rate of one day of every calendar month of duty rendered; |
| (b) | When during any year he is prevented from availing himself of the full vacation. | As for a civil servant in non-vacation Department for that year; and |
| (c) | When he avails himself of only a part of the vacation. | As in (a) above plus such proportion of thirty days as the number of days of vacation not taken bears to the full vacation. |

(iii) There shall be no maximum limit on the accumulation of such leave.

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Directorate of Elementary and Secondary Education
 Peshawar
 PH No. 091-9201389, 9210935,
 9210437, 9210957, 9210468
 Fax 091-9210936 0800-33857,
 No. 2412-2564 / Promotion / Estab
 Dated Peshawar the 30/01/2013

Annexure
 (A)

To All the District Education Officers,
 (Male & Female), in Khyber Pakhtunkhwa.

Subject: Guidelines for Posting of PST B-12 on Promotion to the post of Senior PST B-14 and PSHT B-15, CT B-12 to B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16.

Memo: I am directed to refer to the subject noted above and to clarify that posts of PST B-12 /Senior PST B-14/PSHT B-15 may be rationalized and re-distributed among the Primary schools in the following manner and on Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted as under:-

Up gradation of Posts in Primary Schools (Female) After Rationalization @ 1-40 ratio												
S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization								
				SST B-16	CT B-15	PSHT B-15	SPST B-14	PST B-12	NQ	Callor	Chow	
1	25268	GGPMS A (JICA)	208	1	2	0	2	3	1	1	1	
2	25048	GGPMS B (JICA)	306	1	2	0	2	6	1	1	1	
3	25143	GGCMS C	173	1	0	0	2	3	1	1	1	
4	30056	GGPS D	250	0	0	1	0	1	0	0	1	
5	25244	GGPS E	160	0	0	1	1	2	0	0	1	
6	25244	GGPS F	160	0	0	1	1	2	0	0	1	
7	25277	GGPS G	198	0	0	1	1	3	0	0	1	
8	25277	GGPS H	198	0	0	1	2	3	0	0	1	
9	32912	GGPS I	285	0	0	1	2	4	0	0	1	
10	25097	GGPS J	320	0	0	1	2	5	0	0	1	
11	25138	GGPS K	360	0	0	1	2	6	0	0	1	
12	32606	GGPS L	400	0	0	1	3	6	0	0	1	
13	25278	GGPS M	440	0	0	1	3	7	0	0	1	
Total			5250	3	4	10	23	50	3	3	13	

Up gradation of Posts in Primary Schools (Male) After Rationalization @ 1-40 ratio							
S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization			
				PSHT B-15	SPST B-14	PST B-12	Chow
1	30056	GPS A	250	1	0	1	1
2	25224	GPS B	110	1	1	1	1
3	25244	GPS C	160	1	1	3	1
4	25277	GPS D	198	1	1	3	1

(جاری ہے)

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الکسب

5	25221	GPS E	240	1	2	3	1
6	32912	GPS F	285	1	2	4	1
7	25097	GPS G	320	1	2	5	1
8	25138	GPS H	360	1	2	6	1
9	32606	GPS I	400	1	3	7	1
10	25278	GPS J	440	1	3	7	1
Total			2563	10	17	38	10

- Note:**
- Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15.
 - There will be no post of PSHT B-15 & SPST B-14 in MPS.
 - No of posts of PSHT B-15, SPST B-14 & PST B-12 will not exceed the already communicated sanctioned posts.

Posting on Promotion

- On Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted in the same UCs. Subject to the provisions of sanctioned post.
- Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the school of their present posting and junior most may be transferred to other schools.
- In their promotion order it should be mentioned that their Inter-se-Seniority on lower post will remain intact.
- If anyone forego, promotion, Entry to this effect may be made in his/her Service book.
- Minimum qualifications for the above posts have already been prescribed in the Service Rules notified vide Government of Khyber Pakhtunkhwa Department of Elementary and Secondary Education Department Notification No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Dated the November 15, 2012.

I am further directed to further clarify that:

- On promotion Qari B-12 to the post of Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16, will be posted in High and Higher Secondary Schools.
- 1/3 Qari B-12 posts will be upgraded to Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16 in High and Higher Secondary Schools only in Elementary and Secondary Education Department at District Level.
- No post of CT B-15, PET B-15, AT B-15, DM B-15, TT-15, will be upgraded to B-16 in Middle Schools.
- Senior most Senior CT B-16, Senior AT B-16, Senior DM B-16, Senior PET B-16, Senior TT B-16 (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.

[Signature]
 Dir. Director (Genl)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar.

"Better Copy"

Better copy

Director of Elementary & Secondary
Education
Khyber Pakhtunkhwa Peshawar
Ph No. 091-9201389, 921038
9210437, 9210957, 9210468
Fax: 091-9210936 0800-33857
No. 2412-2545/Promotion / Estab
Dated Peshawar the 23/01/2013

To
All the District Education officers,
(Male & Female), in Khyber Pakhtunkhwa

Subject: Guidelines for posting of PST B-12 on promotion to the post of senior PST B-14 and PSHT B-15, Qari B-12 to B-15 to Senior CT B-16 at B-15 to Senior AT B-16, TT- B-15 to Senior TT B-16, BPS 14 to Senior DM B-16 and PET B-15 to Senior PET B-16.

Memo;

I am directed to refer to the subject noted above and to clarify that posts of PST B-12 / Senior PST B-14/PSHT B-15 may be rationalized and re-distributed among the Primary Schools in the following manner and on promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted as under:

Up gradation of posts in primary Schools (Female) After Rationalization @ 1-40 Ratio

S.No.	School Code	Name of Primary School	Total Enrolments	Sanctioned posts after rationalization							
				SPST B-14	CT B-15	PSHT B-15	SPST B-14	PST B-12	N	Chaw	
1.	25388	GGPMS A (JICA)	208	1	2	0	2	3	1	1	1
2.	25048	GGPMS B (JICA)	306	1	2	0	2	6	1	1	1
3.	25143	GGMS C	173	1	0	0	2	6	1	1	1
4.	30056	GGPS D		0	0	1	0	1	0	0	1
5.	25204	GGPS E		0	0	1	0	1	0	0	1
6.	25244	GGPS F	160	0	0	1	1	2	0	0	1
7.	25277	GGPS G	198	0	0	1	1	3	0	0	1
8.	15221	GGPS H	240	0	0	1	1	2	0	0	1
9.	32912	GGPS I	285	0	0	1	2	4	0	0	1
10.	25097	GGPS J	320	0	0	1	2	5	0	0	1
11.	25138	GGPS K	360	0	0	1	2	6	0	0	1
12.	32606	GGPS L	400	0	0	1	3	6	0	0	1
13.	25278	GGPS M	440	0	0	1	3	6	0	0	1
Total			3250	3	4	10	23	50	3	3	13

Up gradation of posts in primary Schools (Female) After Rationalization @ 1-40 Ratio

S.No.	School Code	Name of Primary School	Total Enrolments	Sanctioned posts after rationalization			
				PSHT B-15	SPST B-14	PST B-12	Chaw
1.	30056	GPS A		1	0	1	1
2.	25224	GPS B	110	1	1	1	1
3.	25244	GPS C	160	1	1	2	1

4.	25277	GPS D	198	1	1	3	1
5.	25221	GPS E	240	1	2	3	1
6.	32912	GPS F	285	1	2	4	1
7.	25097	GPS G	320	1	2	5	1
8.	25138	GPS H	360	1	2	6	1
9.	32606	GPS I	400	1	3	6	1
10.	25278	GPS J	440	1	3	7	1
Total			2563	10	17	38	10

Note:

- 1- Each Primary School (Except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15
- 2- There will be one post of PSHT B-15 & SPST B-14 in MPS
- 3- No of posts PSHT B-15 SPST B-14 & PST B-12 will not exceed the already communicated sanctioned posts.

Posting on Promotion:

- 4- On promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted in the same UCs. Subject to the provisions of sanctioned post,
- 5- Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the school of their present and junior most may be transferred to other schools.
- 6- In their promotion order it should be mentioned that their Inter-sc-Seniority on lower post will remain intact
- 7- If anyone forego promotion for the above posts have already been prescribed in the Secondary Education Department No. SO (PE) 4-5/SSRC/Meeting /2012/Teaching Cadre Dated the November 13, 2012.

I am further directed to further clarify that:

- 1- On promotion Qari B-12 to the post of senior Qari B-15, to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15, to Senior DM B-16 and PET B-15 to Senior PET B-16, will be posted in High and Higher Secondary Schools.
- 2- 1/3 Qari B-12 Posts will be upgraded to Senior Qari B-15, CT B-15 to Senior CT-B16, AT B-15 to Senior AT B-16, TT-15 to Senior B-16, DM B-15 to Senior DM B-16 Elementary and Secondary Education Department at District Level.
- 3- No post of CT B-15, PET B-15, AT B-15, DM B-15, TT-15, will be upgraded to B-16 in Middle Schools.
- 4- Senior most Senior CT B-16, Senior DM B-16, Senior PET B-16 Senior TT B-16 (According to the seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.
- 5-

Sd/-

Dy Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

(11)

Annex.
"B"

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE BUNER AT DAGGAR.

OFFICER ORDER.

Consequent upon the acceptance of appeals, proposal of SDEO (F) Pny and approval of the competent authority the transfer/adjustment of the following PSHTs BPS-15 are hereby ordered to the schools noted against their name in their own pay & scale from the date of taking over charge.

S.NO	Name of Teachers	From	To	Seniority No.	Remarks
1	Miss NOOR JEHAN PSHT	GGPS NARA	GGPS SHALBANDAI NO 1	27	Vs S.No. 3
2	KALSOOM AKHTAR PSHT	GGPS GUMBAT	GGPS NARA	168	Vs S.No. 1
3	SADIA BEGUM PSHT	GGPS SHALBANDAI NO 1	GGPS GUMBAT	44	Vs S.No. 2
4	DULHAJIA PSHT	GGPS TANGORA	GGPS DIWANABABA NO 1	138	Vs S.No. 5
5	SHAKILA NAZ PSHT	GGPS DIWANABABA NO 1	GGPS TANGORA	52	Vs. S. No. 4
6	ZAIBUN NISA PSHT	GGPS MARADU	GGPS MULAYOUSEF	14	Vs. S. No. 7
7	RAZIAT PSHT	GGPS MULAYOUSEF	GGPS MARADU	136	Vs. S.No. 6
8	BAHIJA PSHT	GGPS BADAIR	GGPS KANKOWAI	22	Vs. S.No. 9
9	NASIM BIBI PSHT	GGPS KANKOWAI	GGPS BADAIR	116	Vs. S.No. 8

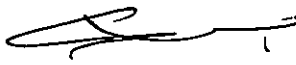
1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned


(SULTAN MAHMOOD MIAN)
DISTRICT EDUCATION OFFICER FEMALE
BUNER

Endst: No. SD 2528 / Dated: 1-3 / 2016

Copy of the above is forwarded to the:-

1. Sub Divisional Female Pny Buner with reference to her No. 2779 dated 30/01/2014.
2. Head Mistress Concerned.
3. Official concerned.


ATTACHED


DISTRICT EDUCATION OFFICER FEMALE
BUNER

Annual

کدرت دوات ڈائریٹریٹ صاحب حکم تعلیم صوبہ خیبر پختونخوا
پہرستان پور ڈسٹرکٹ ایجوکیشن آفیسر فی میل صلح پونیر
صاحب عالی

آداب نزار سے کہ میں سستی لے لے۔
اب بحوالہ آرڈر نمبر 28-8526 مورخہ 03-03-2014 میری سیدلم
۹۹۲۲ کنٹری میں سے ۹۹۲۲ کنٹری کو عمل سے لایا
رہا یہ کہ میں سے PSHT کا ٹرانسفر ہوا۔ یہ میری سابقہ تعلیم اور نزار سے
۲۰۱۰-۲۰۱۱ کو DEO فی میل کا جاب سے میری سیدلم بحوالہ آرڈر نمبر 28-7218 کو
۹۹۲۲ کنٹری کو جو کہ میری اپیل کا حکم سے لے کر میں سے ہوا اور اب دوبارہ میری ٹرانسفر بحوالہ آرڈر
نمبر 28-8526 مورخہ 03-03-2014 ہوا۔

دک اس سے قبل میں ۹۹۲۲ کنٹری میں PSHT پوسٹ پر تھا اور BPS ۱۷ میں ٹرن آؤٹ لے گیا تھا
۹۹۲۲ کنٹری میں آگے کر ۹۹۲۲ کنٹری میں تعینات کیا گیا۔ چونکہ میں یونین کو تسلیم کرنے سے
نہیں تھا اس لیے میں سے بھی ایسے یونین کو تسلیم سے آگے کر دوسری یونین کو تسلیم کرنے
کا حکم آیا۔ حالانکہ جو کہ جو پوزیشنیں ایسے یونین کو تسلیم میں چھوڑ دیتے ہیں۔
دک ٹیٹل سے PSHT ۱۷ میں ۹۹۲۲ کنٹری کو تسلیم میں چھوڑ دیتے ہیں۔

۹۹۲۲ کنٹری میں تعینات تھی تو اسے ۹۹۲۲ کنٹری میں چھوڑ دیا گیا اور اسے تعلق رکھنے والا
دوسری یونین میں ۹۹۲۲ کنٹری میں آگے کر ۹۹۲۲ کنٹری میں چھوڑ دیا گیا اور اسے تعلق رکھنے والا
۹۹۲۲ کنٹری میں چھوڑ دیا گیا اور اسے تعلق رکھنے والا ۹۹۲۲ کنٹری میں چھوڑ دیا گیا اور اسے تعلق رکھنے والا

میں آج خاصا کھڑکتے میں عارضہ الٹی سے زبردستی کہ میری سستی
دک ریاست کا ٹرن لیکر میرا تبادلہ منسوخ لیا گیا۔ درہم میں عدالت کا دروازہ کھول دیا گیا
دک پور پور کا ڈسٹرکٹ۔

ATF

ایک دوبارہ لے لے PSHT ۱۷ میں ۹۹۲۲ کنٹری میں چھوڑ دیا گیا اور اسے تعلق رکھنے والا

13

OFFICE OF THE EXECUTIVE DISTRICT
OFFICER-ELEMENTARY & SECONDARY
DISTRICT BUNER.

NO 9391 /Dated 11/06 /2014.

To

The Sub Divisional Education Officer
(Female)Buner

Subject;- APPEAL IN R/O MISS:NASIM BIBI PSHT GGPS KANKOWAI BUNER
Memo;


Reference your letter :No 2915 dated 31/3/2014,The appeal mentioned above is hereby regretted with immediate effect and you are directed to ensure the duty of the teacher at Govt; girls primary school Badair.


DISTRICT EDUCATION OFFICER(FEMALE)
BUNER

Endst;No _____ Dated _____ 2014.

✓ Copy of the above is forwarded to the;-
1.Mis;Nasim Bibi PSHT GGPS Badair.

DISTRICT EDUCATION OFFICER(FEMALE)
BUNER


ATTACHED

سید محمد حسین

بعدالت

روس

مہتمم

کورٹ فیس

قیمت ایک روپیہ

۲۰۱۷ء منجانب

مورثہ

مقدمہ

دعوی

جرم

چشم بصری
ہام
ڈی ای آر لوئیس

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی کے متعلقہ آن مقام سید محمد حسین نے درخواست کی ہے کہ صاحب موصوف کو مقدمہ کی نقل کاروائی کا کمال مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی نقل کاروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق ذراں پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ ڈگری کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا بصورت ضرورت مذکور کے نسل یا بزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیار حاصل ہونگے اور اسکا ساختہ برواخذہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہاگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہونا یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا نکالت نامہ لکھ دیا کہ سند ہے

المرقوم 14 ماہ اپریل ۲۰۱۷ء

العبد گواہ شہدہ العبد

مقام
سید محمد حسین
Attested and accepted by
Shams ul Haq Achakzai

BEFORE THE KPK SERVICE TRIBUNAL PESHWAR

Service appeal No,543/2014.

Naseem Bibi PSHT:Presently posted at GGPS:Konkahi Teh:Mondar Buner

(Appellant)

VERSUS

- 1- DEO(F) District Buner.
 - 2- Director E&SE Khyber Pakhtun Khwa Peshawar.
 - 3- Bahija PSHT:Presently Posted at GGPS:Badhir Teh :Mandar Buner.
- (Respondents)

INDEX

S.No	Description	Annexure	Page No.
1	Comments		1
2	Copies of Office orders dated,1-10-2013&5-10-2013	A+B	2-4
3	Seniority List /impugned Office Order 6-3-2014	C	5-6
4	Departmental Appeal/Office Order dated,11-4-2014	D	7-8
5	Affidavit		9
6			

05/11/14

Naseem
DEPONENT

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service appeal No 543/2014.

Nasim Bibi PSHT presently posted at GGPS Kankohai tehsil mandar District Buner

Appellant

V/S

1. DEO (F) District Buner
2. Director E&SE Khyber PakhtunKhwā Peshawar
3. Bahija PSHT presently posted at GGPS Badhir tehsil mandar District Buner

Preliminary objection

1. The appellant has concealed the material facts from this Honourable court hence Liable to be dismissed
2. The appellant has not come to this honourable court with clean hands.
3. The appellant has filed the instant appeal just to pressurise the respondent.
4. That the appellant has got no cause of action to file instant appeal.
5. That the instant appeal is barred by law.
6. That the instant appeal is bed for misjoinder and non joinder of parties

Facts:

1. Correct to the extent of appointment of appellant on 14-12-1994, the rest of the para is subject to proof
2. Correct to the extent that the respondents no 1 issued transferred order of the appellant including other teachers in the interest of public service later on the competent authority cancelled the said order (order attached as Annexure A&B)
3. Incorrect the competent authority constituted committee to entertain appeals, the committee decided that Mst bahija was senior from miss Naseem Bibi, therefore she has been adjusted at GGPS Kankohai (seniority list attached as Annexure C)
4. Correct to the extent that appellant filed departmental appeal to respondent No 1. The appeal of the appellant was not according to Law, Rules and policy of the Govt therefore the respondent No 1 regretted the appeal of the appellant

Grounds

- (A) Incorrect. Transfer order Endst No 8026-28 dated 06-03-2014 is according to Law Rules and totally based on merit
- (B) Incorrect. The transfer order is according to law, Rules and no violation was made in transfer order
- (C) Incorrect. No political victimization was made she was treated according to Law and Rules
- (D) That the respondent seeks leave of this honourable tribunal to raise additional grounds at the time of arguments.
It is requested that the appeal may be dismissed with cost


DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER

for Perio Anees
30/10/2014
DIRECTOR E&SE KHYBERPAKHTUNKHWA
PESHAWAR

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BUNER.

Annex A

IN ORDER

Consequent upon the proposal submitted by SDEO (Primary) in connection of posts and approval of competent authority, the following PSMTs (F) BPS 15 are hereby adjusted transfer at the schools against their names with immediate effect in the interest of public service.

No.	Name of Employee	UIC	Pervious School	Proposed School	BPS	Sen/No	Remarks
	Bakhtia	Gagra	GGPS Bajkat 1	GGPS Dewana Baba.1	15	26	V/S.No.2
	Shakeela Naz	Gagra	GGPS Dewana Baba No.1	GGPS; Barjobiamdara	15	52	V/S.No.3
	Khalida	Gagra	GGPS Barjobiamdara	GGP Tangora	15	160	V/S.No.4
	Dulheja	Gagra	GGPS Tangora	GGPS Reyat	15	138	V/S.No.1
	Sadia Begum	Shalbandi	GGPS Shalbandi No.1	GGPS Shalbandi No.2	15	44	V/S.No.6
	Noor Jahan	Shalbandi	GGPS Nara	GGPS Shalbandi No.1	15	27	V/S.No.5
	Zuhra	Shalbandi	GGPS Shalbandi No.2	GGPS Nara	15	140	V/S.No.8
	Kalloom Akhtar	Shalbandi	GGPS Gumbat	GGPS Parshalay	15	168	V/S.No.9
	Hidayat	Shalbandi	GGPS Parshalay	GGPS Gumbat	15	206	V/S.No.8
	Rafat	Karapa	GGPS Mula Yusuf	GGPS Maradu	15	136	V/S.No.11
	Zebun Nisa	Karapa	GGPS Maradu	GGPS Mula Yusuf	15	14	V/S.No.10
	Bahja	Kayga	GGPS Badair	GGPS Konkowal	15	27	V/S.No.13
	Mehnaz	Kayga	GGPS Konkowal	GGPS Badair	15	116	V/S.No.12
	Najmul Uda	Makhranai	GGPS Khanano Dherai	GGPS Gharib Abad	15	56	V/S.No.15
	Fajrur Kausar	Makhranai	GGPS Gharib Abad	GGPS Khanano Dherai	15	145	V/S.No.14
	Muslim Jehan	Chinglai	GGPS Dandi Kot	GGPS Kass Koroono No.2	15	51	V/S.No.17
	Lailun Nihar	Toralai	GGPS Kass Koroono No.2	GGPS Dandi Kot	15	93	V/S.No.16

(ZAIB-UN-NISA)

DISTRICT EDUCATION OFFICER (F)
BUNER

No. 7218-2/1 Dated 1/10/2013

For information to the;
Primary Buner,
Offices Concerned.

[Signature]
DISTRICT EDUCATION OFFICER (F)
BUNER

10

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE BUNER

OFFICE ORDER

The transfer orders issued vide this office Endst No 7218-21 dated 1/10/2013 regarding PSHTs BPS-13 and order Endst No 7222-25 dated 1/10/2013 regarding SPSTs BPS 14 are hereby cancelled with immediate effect in the interest of Public service.

Note:


1-Charge report should be submitted to all concerned.

(ZAIB-UN-NISA)
DISTRICT EDUCATION OFFICER
FEMALE BUNER.

Endst: No: 7301-3 dated: 1/10/2013

Copy forwarded to the:

- 1- S.D.E.O (F) Primary Buner.
- 2- Head M/ stress Concerned.
- 3- Office file.


DISTRICT EDUCATION OFFICER
FEMALE BUNER.

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE BUNER AT DAGGAR.

OFFICER ORDER.

Consequent upon the acceptance of appeals, proposal of SDEO (F) Piry and approval of the competent authority the transfer/adjustment of the following PSHTs BPS-15 are hereby ordered to the schools noted against their name in their own pay & scale from the date of taking over charge.

S.NO	Name of Teachers	From	To	Seniority No.	Remarks
1	Miss NOOR JEHAN PSHT	GGPS NARA	GGPS SHALBANDAI NO 1	27	Vs S.No. 3
2	KALSOOM AKHTAR PSHT	GGPS GUMBAT	GGPS NARA	168	Vs S.No. 1
3	SADIA BEGUM PSHT	GGPS SHALBANDAI NO 1	GGPS GUMBAT	44	Vs S.No. 2
4	DULHAJIA PSHT	GGPS TANGORA	GGPS DIWANABABA NO 1	138	Vs S.No. 5
5	SHAKILA NAZ PSHT	GGPS DIWANABABA NO 1	GGPS TANGORA	52	Vs. S. No. 4
6	ZAIBUN NISA PSHT	GGPS MARADU	GGPS MULAYOUSEF	14	Vs. S. No. 7
7	RAZIAT PSHT	GGPS MULAYOUSEF	GGPS MARADU	136	Vs. S.No. 6
8	BAHIIA PSHT	GGPS BADAIR	GGPS KANKOWAI	22	Vs. S.No. 9
9	NASIM BIBI PSHT	GGPS KANKOWAI	GGPS BADAIR	115	Vs. S.No. 8

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

(SULTAN MAHMOOD MIAN)
DISTRICT EDUCATION OFFICER FEMALE
BUNER

Endst: No. SD 2528 /Dated 1-3 /2014

Copy of the above is forwarded to the:-

1. Sub Divisional Female Piry Buner with reference to her No. 2779 dated 30/01/2014.
2. Head Mistress Concerned.
3. Official concerned.

DISTRICT EDUCATION OFFICER FEMALE
BUNER

Annexure
"C"

Name of Employee	FatherName	Previous UC	Previous School	Present School	Present UC	BPS	DOPPTC	Sen/No	RE-MARKS
Farhadia	Hizbullah Khan	Makhranai	GGPS Korla	GGPS Korla	Makhranai	15	13/05/1997	53	
Najmul Huda	Said Farosh	Makhranai	GGPS Korla	GGPS Khanano Dherai	Makhranai	15	13/05/1997	56	
Tajamul Kausar	Miran Shah	Makhranai	GGPS Gharib Abad	GGPS Gharib Abad	Makhranai	15	17/12/1999	145	
Basmida	Said Salim Khan	Makhranai	GGPS Kandaw Patay	GGPS Kandaw Patay	Makhranai	15	31/03/2002	207	

UC MALAK PUR

Akhtar Begum	Hazrat Rahman	Malakpur	GGCMS Narbatawak	GGPS Beshunai	Malakpur	15	22/11/1992	16	
Shabnum Bibi	Paidad Khan	Malakpur	GGPS Malak Pur	GGPS Malak Pur	Malakpur	15	27/02/1998	79	
Fazilat	Adalat Khan	Malak Pur	GGPS Malak Pur	GGPS Dukada	Malak Pur	15	31/03/2002	196	
Shamim Bibi	W/o Fayaz Khan	Malakpur	GGPS Malak Pur	GGPS Elum	Malakpur	15	31/03/2002	203	

UC MALI KHEL

Gul Bano	Azizur Rahman	Mali Khel	GGPS Jowar No 2	GGPS Jowar No 2	Mali Khel	15	30/06/1997	61	
Hamida	Fazli Rahman	Mali Khel	GGPS Jowar No 1	GGPS Jowar No 1	Mali Khel	15	31/03/2002	220	

UC NAWAGAI

Shaheen	Karimullah	Nawagai	GGPS Bara Nawagai	GGPS Bara Nawagai	Nawagai	15	22/10/1991	11	
Bahija Bibi	W/o Fazal Hassan	Nawagai	GGPS Badair <i>Sura</i>	GGPS Badair	Nawagai	15	27/02/1993	22	
Tamal Bibi	Gul Rahim	Nawagai	GGPS Manjar	GGPS Manjar	Nawagai	15	27/02/1998	80	
Ahmad Zari	Abdul Hanan	Nawagai	GGPS Miangano Dherai	GGPS Miangano Dherai	Nawagai	15	11/05/1999	90	
Bibi Amina	W/o Farid Khan	Nawagai	GGPS Tinawlo Dherai	GGPS Tinawlo Dherai	Nawagai	15	11/05/1999	112	
Nasim Bibi	W/o Anwar Zeb	Nawagai	GGPS Bara Nawagai	GGPS Kankoai	Kawga	15	11/05/1999	116	
Husna Bibi	Manzoorul Haq	Nawagai	GGPS Bara Nawagai	GGPS Kata Kot	Makhranai	15	11/05/1999	117	
Nagina Bibi	Khan	Nawagai	GGPS Kuza Nawagai	GGPS Kuza Nawagai	Nawagai	15	15/07/1999	123	
Bushra Begum	Ihsanullah	Nawagai	GGPS Amazo Koto	GGPS Amazo Koto	Nawagai	15	18/12/1999	147	
Hafiza Muhsina Bibi	W/o Usman Ali	Nawagai	GGCMS Sura	GGPS Mala Sar	Makhranai	15	18/12/1999	149	
Hussan Baha	W/o Zameer Rahman	Nawagai	GGPS Bara Nawagai	GGPS Makhranai	Makhranai	15	25/04/2000	161	
Asia	Said Wahab	Nawagai	GGPS Kanganr	GGPS Kanganr	Nawagai	15	31/03/2001	186	

UC NOORIZI

Sultan Zari	Mirza Shah	Norizi	GGPS Chanar	GGPS Chanar	Norizi	15	25/05/1996	38	
Zakia	Masal Khan	Norizi	GGPS Cheena Dherai	GGPS Cheena Dherai	Norizi	15	22/11/2001	187	

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE BUNER AT DAGGAR.

OFFICER ORDER.

Consequent upon the acceptance of appeals, proposal of SDEO (F) Pny and approval of the com authority the transfer/adjustment of the following PSHTs BPS-15 are hereby ordered to the schools noted against name in their own pay & scale from the date of taking over charge.

S.NO	Name of Teachers	From	To	Seniority No.	Remarks
1	Miss NOOR JELAN PSHT	GGPS NARA	GGPS SHALBANDAI NO 1	27	Vs S.No. 3
2	KALSOOM AKHTAR PSHT	GGPS GUMBAT	GGPS NARA	168	Vs S.No. 1
3	SADIA BEGUM PSHT	GGPS SHALBANDAI NO 1	GGPS GUMBAT	44	Vs S.No. 2
4	DULHAJIA PSHT	GGPS TANGORA	GGPS DIWANABABA NO 1	138	Vs S.No. 5
5	SHAKILA NAZ PSHT	GGPS DIWANABABA NO 1	GGPS TANGORA	52	Vs. S. No. 4
6	ZAIB UN NISA PSHT	GGPS MARADU	GGPS MULAYOUSEF	14	Vs. S. No. 7
7	RAZIAT PSHT	GGPS MULAYOUSEF	GGPS MARADU	136	Vs. S.No. 6
8	BAHJIA PSHT	GGPS BADAIR	GGPS KANKOWAI	22	Vs. S.No. 9
9	NASIM BIBI PSHT	GGPS KANKOWAI	GGPS BADAIR	116	Vs. S.No. 8

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

(SULTAN MAHMOOD MIAN)
DISTRICT EDUCATION OFFICER FEMALE
BUNER

Endst: No. 802528 /Dated 6-3 /2013.

Copy of the above is forwarded to the:-

1. Sub Divisional Female Pny Buner with reference to her No. 2779 dated 30/01/2014.
2. Head Mistress Concerned.
3. Official concerne

DISTRICT EDUCATION OFFICER FEMALE
BUNER

Attested
Muhammad

Sub: Divini: Edu:
Officer (F) Primary Buner

Annexure
A.D.

محرم صوم پندرہ ختم خواہ
بہ سناوات ڈسٹرکٹ ایجوکیشن آفیسر فی میل ضلع پونیر
جناب عالی!

آداب تزارش ہے کہ میں مسیٰ علیہ السلام کے بارے میں ایک خط لکھ رہا ہوں۔
اب بحوالہ آرڈر نمبر 28-26-80 مورخہ 03-03-2014 میری تبادلہ 44 پی پی کے کنوینس سے 44 پی پی کے پونیر کو عمل میں لایا گیا
اور وہیں جا کر مسیٰ علیہ السلام کے بارے میں ایک خط لکھ رہا ہوں۔ یہ میری سابقہ تبادلہ نمبر 28-26-80 کے تحت ہے۔
2013-13-22 کو جاری کیا گیا۔ اب وہاں میری پونیر میں ایک خط لکھ رہا ہوں۔
2013-10-01 کو DEO فی میل کیا گیا جس سے میری تبادلہ بحوالہ آرڈر نمبر 28-26-80 کو 44 پی پی کے پونیر میں لایا گیا
44 پی پی کے پونیر کو جو کہ میری اپیل کے تحت ہے۔ بعد میں منسوخ ہوا اور اب دوبارہ میری تزارش بحوالہ آرڈر
نمبر 28-26-80 مورخہ 03-03-2014 ہوا۔

ان اس سے قبل میں 44 پی پی کے پونیر میں ایک خط لکھ رہا تھا جس کا نمبر BPS No. 15 ہے۔ اس خط میں
44 پی پی کے پونیر میں لکھا گیا کہ 44 پی پی کے کنوینس میں تعینات کیے گئے۔ جو کہ میں پونیر کو منسلک ہوا ہے
کو بھیجا گیا۔ حالانکہ جو کہ جو پونیر استانیہ میں ہے اسے بھی پونیر کو منسلک سے لکھا گیا کہ پونیر کو منسلک کو
ان کی تعینات ہے PSAT 03
44 پی پی کے پونیر میں لکھا گیا کہ اسے بھی پونیر کو منسلک سے لکھا گیا کہ پونیر کو منسلک کو
ان کی تعینات ہے PSAT 03

ان کو اس سے قبل میں 44 پی پی کے پونیر میں ایک خط لکھ رہا تھا جس کا نمبر BPS No. 15 ہے۔ اس خط میں
44 پی پی کے پونیر میں لکھا گیا کہ 44 پی پی کے کنوینس میں تعینات کیے گئے۔ جو کہ میں پونیر کو منسلک ہوا ہے
کو بھیجا گیا۔ حالانکہ جو کہ جو پونیر استانیہ میں ہے اسے بھی پونیر کو منسلک سے لکھا گیا کہ پونیر کو منسلک کو
ان کی تعینات ہے PSAT 03

میں اس خط میں لکھا گیا کہ اسے بھی پونیر کو منسلک سے لکھا گیا کہ پونیر کو منسلک کو
ان کی تعینات ہے PSAT 03

ان کی تعینات ہے PSAT 03

OFFICE OF THE EXECUTIVE DISTRICT
OFFICER-ELEMENTARY & SECONDARY
DISTRICT BUNER.

NO 29391 /Dated 11/06 /2014.

To

The Sub Divisional Education Officer
(Female)Buner

Subject;- APPEAL IN R/O MISS:NASIM BIBI PSHT GGPS KANKOWAI BUNER
Memo;

Reference your letter :No 2915 dated 31/3/2014,The appeal mentioned above is hereby regretted with immediate effect and you are directed to ensure the duty of the teacher at Govt; girls primary school Badair.


DISTRICT EDUCATION OFFICER(FEMALE)
BUNER

Endst;No _____ Dated _____ 2014.

✓ Copy of the above is forwarded to the:-
1. Mis;Nasim Bibi PSHT GGPS Badair.

DISTRICT EDUCATION OFFICER(FEMALE)
BUNER

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. 543/2014

NASEEM BIBI PSHT .Presently posted at GGPS Kankohai Teh: Mandarn Buner.
APPELLANT.

VERSUS

- DEO (F) BUNER
- Director E&SE KP Peshawar.
- Bahija PSHT Presently posted at GGPS Badir, Teh Mandarn Buner.

.....RESPONDENTS.

AFFIDAVIT

I Hamidur Rehman ADEO (Estab) Buner Distt; do hereby solemnly affirms & state on oath that the whole contents of these comments are true and correct to the best of my knowledge and belief & nothing has been concealed from this August Court.



DEPONENT .

(1)

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

Service Appeal No.443/2014

Nasim Bibi (PSHT)Appellant.

Versus

The District Education Officer (Fe-male) District Buner
and others.....Respondents.

REPLY ON BEHALF OF RESPONDENT NO.3.

Respectfully Sheweth,

Preliminary objections.

- I. The appellant has no cause of action and locus standi.
- II. That the appeal is not maintainable.
- III. That appellant is not an aggrieved person within the meaning of section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.
- IV. That appellant has not come to the court with clean hands.
- V. That the appeal is liable to be dismissed on the ground of mis joinder and non joinder of necessary parties.

- VI. That the appeal is time barred.
- VII. That the principle of Estoppel lies against the appellant.

Facts:

1. Pertain to record and proof, hence no comments.
2. Incorrect, hence denied. The answering respondent No.3 (Bahija) and appellant have been promoted to the post of PSHT (BPS-15) vide Consolidated order dated 22-02-2013 and posted at GGPS Badiar and GGPS Kankowai respectively. The answering respondent.No.3 lies at serial No.13 and whereas appellant lies at serial No.75 of the list (Annexure-R/I). Later on through prescribed procedure another order dated 01-10-2013 issued and the answering respondent made her compliance, but the same was cancelled after only 04 days. Since the order was very pre-mature and was against the existing policy, therefore, the answering respondent No. 3 submitted departmental appeal against the same. The appeal of the answering respondent No.3 was graciously allowed and the order dated 05-10-2013 was set aside vide Order dated 06-03-2014.
3. Incorrect, hence denied. Since the order dated 06-03-2014 has been passed on the departmental appeal of the answering respondent No.3, therefore, it being an appellant order was required to be challenge directly before this Honourable

Service Tribunal, appellant without re course to Service Tribunal as per prescribed rules has made departmental appeal against the appellate order. No appeal could lie as against an order passed on departmental appeal. On this score the service appeal is not only time barred, but anfractuous and not maintainable. The order dated 06-03-2014 is self explanatory.

4. Incorrect, hence denied. Since the so called departmental appeal was not only time barred, but not maintainable, therefore rightly has been rejected vide impugned order dated 11-04-2014.

Grounds:

- A. That ground A of the appeal is incorrect, hence denied. The order dated 05-10-2013 was very premature and was against the tenure policy, therefore, the same has been rightly rejected vide impugned appellate order dated 06-03-2014.
- B. That ground B of the appeal is incorrect, hence denied. Appellant has rightly been treated in accordance with law, rule and policy on the subject.
- C. That Gound C of the appeal is incorrect, hence denied. The explanation has already been submitted in preceeding Paras.

4

D. That the answering respondent would also like to seek the permission of this Honorable Court to advance grounds in rebuttal at the time of hearing.

It is, therefore, humbly prayed that on acceptance of this reply, the appeal of appellant may graciously be dismissed with costs.

Through Respondent No.3.
Ashraf Ali Khattak,

and

Nawaz Khan Khattak
Advocates, Peshawar.

Dated: _____ / 10/ 2014

Counter Affidavit

I, Mst: Bahija PSHT, Govt Primary School, Kankowai, do hereby affirm and declare on oath that the contents of this reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Bahija
Deponent

ATTESTED



5

NOTIFICATION:

OFFICE OF THE DEPUTY COMMISSIONER, DISTRICT EDUCATION, PESHAWAR

It is hereby notified that the following Senior Primary School Teachers (SPST) BPS-14 are hereby promoted to the post of Primary School Head Teachers (PSHT) BPS-15 (8500-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Govt. in Teaching cadre on the terms and conditions given below with immediate effect and further posted in the schools noted against each.

S.No	Name of Teacher	Father's / Husband Name	Present School	Place of Posting	Remarks
1	Bilal Dastgeer	Dawlat Shah	GGPS Totala	GGPS Ahmad Ali Uhera	
2	Shamim Begum	Gul Hassan	GGPS Akbar Sarai	GGPS Akbar Sarai	
3	Bushra Begum	Ihsanullah	GGPS Amazo Foto	GGPS Amazo Foto	
4	Fatima Bibi	W/o Hakim Shah	GGPS Ambela	GGPS Ambela	
5	Shabeen Bibi	Abdul Rashid	GGPS Ambela	GGPS Ambela Dara	
6	Zakia Bibi	Sher Akbar	GGPS Anzwar	GGPS Anzwar	
7	Zubeda	Amir Rahman	GGCMS Topai	GGPS Asharo Maradu	
8	Saadia Begum	Bakhtuda Zada	GGPS Ashero Maira	GGPS Ashero Maira	
9	Kyuzar Jehan	Amir Zada	GGCMS Topai	GGPS Awanay	
10	Mubaram Bibi	Sikandar Khan	GGCMS Topai	GGPS Badar	
11	Bahija Bibi	W/o Fazal Hassan	GGCMS Sora	GGPS Badar	
12	Mahesh Shahzad	W/o Qadir Bhai	GGCMS Sora	GGPS Badar	
13	Maved Akhtar	W/O Sultane Rom	GGCMS Sulhan Was	GGPS Bagh Bahra Abad	
14	Salma	Abdul Aziz	GGPS Bagra	GGPS Bagra	
15	Fatmat Jehan	Afsar	GGPS Baikhanai	GGPS Baikhanai	
16	Bijra Begum	Muhammad Khan	GGPS Baikhanai	GGPS Baikhanai	
17	Asia Bibi	Mohammad Hashim Khan	GGPS Baida 1 Amra	GGPS Baida 2 Amra	
18	Nirakat Bibi	Sardullah Khan	GGPS Bar Gokand	GGPS Bar Gokand	
19	Lahzesh Begum	Ahmad Shah	GGPS Lakha Band	GGPS Bar Kalay	
20	Salma Begum	Muhammad Ali Khan	GGPS Gulbandar No 1	GGPS Bar Shammal	
21	Shahera	Karimullah	GGPS Bara Nawagal	GGPS Bara Nawagal	
22	Shahizat	Saeedullah Khan	GGPS Kalhanai	GGPS Barjo Biam Daza	
23	Danalla	Amir Mohammad	GGPS Chazi Khany	GGPS Barjo Kany	
24	Zakia Bibi	W/o Iqbal Zada	GGPS Baran	GGPS Baran	
25	Shagufta Yasmin	Umar Khatib	GGPS Batana Amra	GGPS Batana Amra	
26	Hussan Ara	Said Malook	GGPS Batara	GGPS Batara	
27	Shahnaz Begum	Sultan Mahmood	GGPS Chinglai	GGPS Bato	
28	Roshan Jehan	Said Bashir	GGPS Bayee Kalay	GGPS Bayee Kalay	
29	Farida Bibi	Faqirullah	GGPS Smigran	GGPS Bazangay	
30	Akhtar Begum	Hazrat Rahman	GGCMS Narbatawal	GGPS Beshumai	
31	Nargis Bibi	Zahir Shah	GGPS Bar Gokand	GGPS Bikand	
32	Nabid Parveen	Parvez Khan	GGPS Bajkatta	GGPS Budal	
33	Zahida	Haji Mohammad	GGPS Diwana Baba-2	GGPS Chahandai	
34	Ishad Begum	Said Akbar	GGPS Dgal	GGPS Chanai	
35	Sultan Zari	Mirza Shah	GGPS Chanar	GGPS Chanar	
36	Shabeen	Nazir Mohammad	GGPS Pacha Kalay-2	GGPS Char	

Attested
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S.No	Name of Teacher	Father's / Husband Name	Present School	Place of Posting	Remarks
37	Mulkiat	Mir Hassan	GGPS Pacha Katlay-2	GGPS Pacha Katlay-2	
38	Mulkiat	Mir Hassan	GGPS Totalai	GGPS Charorai	
39	Zakia	Masal Khan	GGPS Cheena Dherai	GGPS Cheena Dherai	
40	Saqeda Akhtar	Fazli Rabbi	GGPS Chinglai	GGPS Chinglai	
41	Musarrat Sultana	Badshah Khan	GGPS Dagai	GGPS Dagai	
42	Shehnaaz	Usman Shah	GGPS Daggar	GGPS Daggar	
43	Shazia Qadir	Ghulam Qadir	GGPS Dakara	GGPS Dakara	
44	Kaloom Bibi	Abdul Shakoor	GGPS Totalai	GGPS Dand Maira	
45	Muslim Jehan	Abdul Ghani	GGPS Dargai	GGPS Dandi Kat	
46	Rammat Bibi	Abdul Majeed	GGPS Dargai	GGPS Dargalal	
47	Shakila Naz	Zarin Khan	GGPS Bajkatta	GGPS Diwana Baba No 1	
48	Bakht Sreena	Ayub Khan	GGPS Diwana Baba Ziarat	GGPS Diwana Baba Ziarat	
49	Fazilat	Adalat Khan	GGPS Malak Pur	GGPS Dukada	
50	Norin Gul	W/o Fazal Qadar	GGPS Elai	GGPS Elai	
51	Shaniam Bibi	W/o Fayaz Khan	GGPS Malak Pur	GGPS Elum	
52	Musarrat Kausar	W/o Shamsur Rehman	GGPS Ganshal	GGPS Ganshal	
53	Tajamul Begum	Fazila Shah	GGPS Gharib Abadi	GGPS Gharib Abad	
54	Shahat Begum	W/o Abdul Nasir	GGPS Ghazi Khanay	GGPS Ghazi Khanay	
55	Shamim Bibi	Azizur Rehman	GGPS Ghazi Kot	GGPS Ghazi Kot	
56	Shazia Bibi	Amir Hameed	GGPS Ghughushto	GGPS Ghughushto	
57	Shahida	W/o Gul	GGPS Gira	GGPS Gira	
58	Musarrat Naz	Mohammad Khan	GGPS Gira	GGPS Gira	
59	Sabina	W/o Midyatur Rehman	GGPS Gul Bandal	GGPS Gul Bandal	
60	Ihsan Bibi	Noor Habib	GGPS Batara	GGPS Gulano Dairai	
61	Kaloom Akhtar	Zarin Shah	GGPS Nara	GGPS Gumbat	
62	Tahira Yasmin	W/o Muhammad Shah Rume	GGPS Hal	GGPS Hal	
63	Arza Begum	Bilal Iqbal	GGPS Hisar	GGPS Hisar	
64	Farida Begum	Gul Moinuddin	GGPS Chinglai	GGPS Jal Dand	
65	Rahimul Sherida	W/o Abdul Shakoor	GGPS Jang Dara KK	GGPS Jang Dara KK	
66	Kaloom Bibi	Abdul Wahab	GGPS Batai	GGPS Jowar No 1	
67	Gul Bano	Azizur Rahman	GGPS Jowar No 2	GGPS Jowar No 2	
68	Shehnaaz Begum	Sara Akbar	GGPS Totalai	GGPS Kadal	
69	Hilum Kunari	Sanat Ram	GGPS Batai	GGPS Kala Bat	
70	Mehnaz Gul	Mohammad Irshad	GGPS Bayce Kalay	GGPS Kala Khala	
71	Khalida	Faiz Rasan	GGPS Kalpanai	GGPS Kalpanai	
72	Baramula	W/O S.Solim Khan	GGPS Nawagai	GGPS Kandaw Palay	
73	Hayat Bibi	Sher Mohammed	GGPS Chinglai	GGPS Kangalal	
74	Asa	Said Wahab	GGPS Kangar	GGPS Kangar	
75	Nasim Bibi	W/O Anwar Zeb	GGPS Bara Nawagai	GGPS Kankoi	
76	Nasim Akhtar	Sher Afzal Khan	GGPS Kas Korona	GGPS Kas Korona	
77	Lailun Mibe	Amir Jaq	GGPS Kas Korona No 2	GGPS Kas Korona No 2	
78	Hirwa Bibi	Manzoorul Haq	GGPS Bara Nawagai	GGPS Kata Kot	
79	Minder Kunari	Jamna Das	GGPS Pacha Katlay-2	GGPS Katakala	
80	Davender Bai	Ome Perakash	GGPS Katakala	GGPS Kawga	
81	Shamshad Begum	Rudullah Shah	GGPS Ketawar	GGPS Ketawar	
82	Gand Begum	Sultan Zameer Khan	GGPS Kas Korona	GGPS Khadar Khan	

Attested
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S. No.	Name of Teacher	Father's Name	Present Station	Proposed Station
131	Zakira	Naseer Gul	GGPS Qasim Khel	GGPS Qasim Khel
132	Bakhtla	Dawood Shah	GGPS Sunigram	GGPS Boga
133	Musrat Begum	Shah Zaman Khan	GGPS Bajkatta	GGPS Riyal
134	Munilkat Begum	W/o Muhammad Ishaq	GGEMS Sultan Wax	GGPS Safarzo Mafra
135	Parveen Akhtar	Sher Jan Khan	GGPS Sawawal	GGPS Sawawal
136	Bibi Nazakat	Abdul Karim	GGPS Totala	GGPS Shalbandi
137	Sahib Begum	Fazl Mahmood	GGPS Shalbandi No 1	GGPS Shalbandi
138	Zubra Bibi	W/o M. Munir	GGPS Shalbandi No 1	GGPS Shalbandi No 1
139	Shahreen Akhtar	Khalid Dad	GGPS Shalbandi No 2	GGPS Shalbandi No 2
140	Kaniz Fatima	Sarfaroosh Khan	GGPS Shamshi Kotay	GGPS Shamshi Kotay
141	Farida Begum	W/o Faraz Qayyum	GGPS Sharsheem Tangay	GGPS Sharsheem Tangay
142	Ushwat	Muhammad	GGPS Sher Gan	GGPS Sher Gan
143	Balqaat Begum	Muhammad Yousof	GGPS Minal Nayay Kalay	GGPS Minal Nayay Kalay
144	Tabassum Begum	W/o Ghulam Asim	GGPS Suwawal	GGPS Suwawal
145	Bakhti Sewa	Inayatullah Khan	GGPS Shamshi Kotay	GGPS Sro
146	Shazia Khanum	Abdul Wahid	GGPS Sunigram	GGPS Sunigram
147	Shagufta Naz	Said Hakim Shah	GGPS Surkhaw Banda	GGPS Surkhaw Banda
148	Duthaja	Saifoor	GGPS Takhta Band	GGPS Takhta Band
149	Bibi Anissa	W/o Ghulam Khan	GGPS Diwana Baba Pta 1	GGPS Tangay
150	Ulfat Bibi	Ihsanullah	GGPS Timawlo Dherat	GGPS Timawlo Dherat
151	Samai Begum	Mir Hawas	GGPS Timawlo Dherat	GGPS Timawlo Dherat
152	Shahreen Begum	W/o Muhammad Sahib	GGPS Totala	GGPS Totala
			GGPS Bara Nawagai	GGPS Waid'Abad

TERMS AND CONDITIONS:

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Government.
- 3 Their services can be terminated any time, in case their performance is found unsatisfactory during probationary period.
- 4 In case of misconduct, they shall be proceeded under the rules framed time to time.
- 5 Charge report should be submitted to all concerned.
- 6 Their normal domestic and family jobs will remain intact.
- 7 No TA / DA is allowed for joining their duty.
- 7 They will give an undertaking to this effect to be recorded in their Service Books accordingly.

Attested
(Signature)
True Copy

SURHAYA BEGUM
 DISTRICT EDUCATION OFFICER (F)
 BUNER

Enclt No. 258-G2

Dated 22/2/2013

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

- 1 Director Elementary and Secondary Education Khyber Pukhtun Khwa Peshawa.
- 2 District Accounts Buner.
- 3 SDEO (F) Primary Buner.
- 4 Officials Concerned.
- 5 Office File.

(Signature)
 DISTRICT EDUCATION OFFICER (F)
 BUNER
 22/2/2013

Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986

[Gazette of Khyber Pakhtunkhwa, Extraordinary, Page No. 1290-1293, 2nd June, 1986]

No. SORII (S&GAD) 3(4)/78 (Vol. 11).---In exercise of the powers conferred by section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973, (Khyber Pakhtunkhwa Act XVIII of 1973), read with section 22 thereof, the Governor of the Khyber Pakhtunkhwa is pleased to make the following rules, namely:--

1. Short title, commencement and application.---(1) These Rules may be called the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986.

(2) They shall come into force at once and shall apply to every person who is a member of the civil service of the Province or is the holder of a civil post in connection with the affairs of the Province and shall also apply to or in relation to a person in temporary employment in the civil service or post in connection with the affairs of the Province.

2. Definitions.---In these rules, unless there is anything repugnant in the subject or context;

- (a) "Appellate Authority" means the officer or authority next above the competent authority;
- (b) "Competent Authority" means the authority or authorised officer, as the case may be, as defined in the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 1973, or the authority competent to appoint a civil servant under the rules applicable to him; and
- (c) "Penalty" means any of the penalties specified in rule 4 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 1973.

3. Right of Appeal.---(1) A civil servant aggrieved by an order passed or penalty imposed by the competent authority relating to the terms and conditions of his service may, within thirty days from the date of communication of the order to him, prefer an appeal to the appellate authority:

Provided that where the order is made by the Government, there shall be no appeal but the civil servant may submit a review petition:

[Provided further that the appellate or the reviewing authority, as the case may be, may condone the delay in preferring the appeal or the review petition, if it is satisfied that the delay was for the reasons beyond the control of the appellant or that the earlier appeal or review petition was not addressed to the correct authority.]

Explanation.---For the purposes of the first proviso, the expression "appeal" where the context so requires, shall mean the "review petition" as well.

(2) Where the order of the competent authority affects more than one civil servant, every affected civil servant shall prefer the appeal separately.

(3) Where the aggrieved civil servant has died, the appeal may be filed, or if already filed by such civil servant before his death, may be pursued, by his legal heir or heirs; provided that the benefit likely to accrue on the acceptance of such appeal is admissible to such legal heir or heirs under any rules for the time being applicable to civil servants.

4. Form of Memorandum.---(1) Every memorandum of appeal shall--

- (a) contain full name and address, official designation and place of posting of the appellant;
- (b) state in brief the facts leading to the appeal;
- (c) be accompanied by a certified copy of the order appealed against and copies of all other documents on which the appellant wishes to rely.

Explanation.---Where an aggrieved civil servant has died, his legal heir or heirs, while filing the appeal or applying for review, as the case may be, shall also add documents in support of his or their relationship with the deceased civil servant.

(2) The appeal shall be submitted through the Head of the office in which the appellant is posted at the time of filing the appeal, or in the case of a deceased civil servant, where he was last posted before his death. The Head of the office shall forward the appeal to the competent authority, if he himself is not such authority and the competent authority shall after adding his own comments, if any, transmit the appeal to the appellate authority for necessary orders.

(3) No appeal shall be entertained if it contains abusive, disrespectful or improper language.

5. Action by the appellate authority.---(1) The appellate authority, after making such further inquiry or calling for such information or record or giving the appellant an opportunity of being heard, as it may consider necessary, shall determine--

- (a) whether the facts on which the order appealed against was based have been established;
- (b) whether the facts established afford sufficient ground for taking action; and
- (c) Whether the penalty is excessive, adequate or inadequate

and after such determination, shall confirm, set aside or pass such order as it thinks proper; provided that no order increasing the penalty shall be passed without giving the appellant an opportunity of showing cause as to why such penalty should not be increased.

(2) The competent authority against whose order an appeal is preferred under these rules shall give effect to any order made by the appellate authority and shall cause the order so passed to be communicated to the appellant without undue delay.

6. Withholding of appeal in certain cases.---An appeal be withheld by the competent authority if--

- (a) it is an appeal in a case in which no appeal lies under these rules; or
- (b) it does not comply with the requirements of rule 4; or
- (c) it is not preferred within the time limit specified in sub-rule (1) of rule 3 and no reason is given for the delay; or
- (d) it is addressed to an authority or officer to whom no appeal lies under these rules;

Provided that in every case in which an appeal is withheld, the appellant shall be informed of the fact and reasons for it.

Provided further that an appeal withheld for failure to comply with the requirements of rule 4 or clause (d) of this sub-rule may be resubmitted within thirty days of the date on which the appellant is informed of the withholding of the appeal and, if resubmitted properly in accordance with the requirements of these rules, shall be deemed to be an appeal under rule 3 and shall be dealt with in accordance with the provisions of these rules.

(2) No appeal shall be against the withholding of an appeal under this rule.

7. Disposal of appeal.---(1) Every appeal which is not withheld under these rules shall be forwarded to the appellate authority alongwith the comments by the competent authority from whose order the appeal is preferred.

(2) A list of appeals withheld under rule 6, with reasons for withholding them, shall be forwarded quarterly by the withholding authority to the appellate authority.

(3) The appellate authority may call for any appeal admissible under these rules which has been withheld by the competent authority and may pass such order thereon as it considers fit.

8. Savings.---Nothing in these rules shall operate to deprive any person of any right of appeal which he would have if these rules had not been made, in respect of any orders passed before they came into force.

9. Pending appeals.---All appeals pending immediately before the coming into force of these rules shall be deemed to be appeals under these rules.

10. Repeal.---The Khyber Pakhtunkhwa Civil Services (Punishment and Appeal) Rules, 1943, are hereby repealed.

Khyber Pakhtunkhwa Civil Servants Revised Leave Rules, 1981

[Gazette of Khyber Pakhtunkhwa, Part I, Page No. 151-160, 23rd December, 1981]

No. FD. SO (SR-IV) 5-54 / 80 (Vol:II) dated 17-12-1981.---In exercise of the powers conferred by section 26 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act XVIII of 1973) and in supersession of this Department's Notification No. FD.SO(SR-IV) 1-17/78, dated the 20th November, 1979, the Governor of the Khyber Pakhtunkhwa is pleased to make the following rules namely:--

1. Short title, commencement and application.---(1) These rules may be called the Khyber Pakhtunkhwa Civil Servants Revised Leave Rules, 1981.

(2) They shall come into force at once.

(3) They shall apply to all Civil Servants under the rule making authority of the Governor except those who opted not to be governed by the Khyber Pakhtunkhwa Civil Servants Leave Rules, 1979.

2. Admissibility of Leave of Civil Servant.---Leave shall be applied for, expressed and sanctioned in terms of days and shall be admissible to a civil servant at the following rate and scale:--

(i) A civil servant shall earn leave only on full pay. It shall be calculated at the rate of four days for every calendar months of the period of duty rendered and credited to the leave account as "leave on fully pay" duty period of 15 days or less in a calendar month being ignored and those of more than 15 days being treated as a full calendar month, for the purpose. If a civil servant proceeds on leave during a calendar month and returns from it during another calendar month and the period of duty in either month is more than 15 days, the leave to be credited for both the incomplete months will be restricted to that admissible for one full calendar month only.

(ii) The provisions of clause (i) will not apply to vacation departments. A civil servant of a vacation department may earn leave on full pay as under:--

- | | | |
|-----|--|---|
| (a) | When he avails himself of vacation in a calendar year. | At the rate of one day of every calendar month of duty rendered; |
| (b) | When during any year he is prevented from availing himself of the full vacation. | As for a civil servant in non-vacation Department for that year; and |
| (c) | When he avails himself of only a part of the vacation. | As in (a) above plus such proportion of thirty days as the number of days of vacation not taken bears to the full vacation. |

(iii) There shall be no maximum limit on the accumulation of such leave.

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BUNER

NOTIFICATION

Consequent upon the recommendation the Departmental Promotion Committee held on 29/1/2013 as contained in the minutes of the meeting issued vide this office No.193-98 dated 12/2/2013 and the persuance of Govt. Khyber Pukhtun Khwa Elementary and Secondary Education Department notification No.SO(PE)4-5 / SSRC /Meeting/2012 /Teaching cadre Peshawar dated the Nov. 13, 2012, the following Senior Primary school Teachers (SPST) BPS-14 are hereby promoted to the post of Primary School Head Teachers (PSHT) BPS-15 (8500-700-29500) plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Govt., in Teaching cadre on the terms and conditions given below with immediate effect and further posted in the schools noted against each.

S.No	Name of Teacher	Father's / Husband Name	Present School	Place of Posting	Remarks
1	Bakht Farida	Dil Feroz	GGPS Maskipur	GGPS Agarai	
2	Farida Bibi	Dawlat Shah	GGPS Totalai	GGPS Ahmad Ali Dherai	
3	Shamim Begum	Gul Hassan	GGPS Akhun Serai	GGPS Akhun Serai	
4	Bushra Begum	Ihsanullah	GGPS Amazo Koto	GGPS Amazo Koto	
5	Fatima Bibi	W/o Hakim Shah	GGPS Ambela	GGPS Ambela	
6	Shahreen Bibi	Abdur Rashid	GGPS Ambela	GGPS Ambela Dara	
7	Zakia Bibi	Sher Akbar	GGPS Amnawar	GGPS Amnawar	
8	Sarwar Bibi	Aminur Rashid	GGPS Ketawar	GGPS Anghapur	
9	Zubeda	Amir Rahman	GGCMS Topai	GGPS Asharo Maradu	
10	Saeeda Begum	Bakhtmin Zada	GGPS Ashezo Maira	GGPS Ashezo Maira	
11	Kausar Jehan	Amir Zarin	GGPS Ketawar	GGPS Ashezo Naway Kalay	
12	Muharam Bibi	Sikandar Khan	GGCMS Topai	GGPS Awamary	
13	Nahija Bibi	W/o Fazal Hassan	GGCMS Sura	GGPS Badair	
14	Balqis Shanteen	W/O Bakht Akbar	GGPS-Qasam Khel	GGPS Bagh	
15	Naved Akhtar	W/O Sultane Rum	GGCMS Sultan Was	GGPS Bagh Nasim Abad	
16	Salma	Abdul Aziz	GGPS Bagra	GGPS Bagra	
17	Farhat Jehan	Afsar	GGPS Baikhanai	GGPS Baikhanai	
18	Miraj Begum	Miraj Khan	GGPS Baikhanai	GGPS Bajkatta	
19	Asia Bibi	Muhammad Hasham Khan	GGPS Banda Panjpai	GGPS Banda Panjpai	
20	Nizakat Bibi	Saidullah Khan	GGPS Bar Gokand	GGPS Bar Gokand	
21	Fahzeeb Begum	Ahmad Shah	GGPS Takhta Band	GGPS Bar Kalay	
22	Hidayat Begum	Hasham ALI KHAN	GGPS Shalbandai No 1	GGPS Bar Shamnal	
23	Shaheen	Karimullah	GGPS Bara Nawagai	GGPS Bara Nawagai	
24	Shah Izat	Saeedullah Khan	GGPS Kalpanzi	GGPS Barjo Biam Dara	
25	Jamalia	Amir Mohammad	GGPS Ghazi Khanay	GGPS Barjo Kanay	
26	Zakia Bibi	W/o Iqbal Zada	GGPS Batai	GGPS Batai	
27	Shagufta Yasmin	Umar Khitab	GGPS Batanai Amazi	GGPS Batanai Amazi	
28	Hussan Ara	Said Malook	GGPS Btara	GGPS Batara	
29	Shahnaz Begum	Sultan Mahmood	GGPS Chinglai	GGPS Bato	
30	Man Jehan	Said Bashir	GGPS Barjo Kalay	GGPS Bayee Kalay	
31	Zakia Bibi	Faqirullah	GGPS Sunigram	GGPS Bazargay	
32	Satar Begum	Hazrat Rahman	GGPS Narbazawal	GGPS Beshunai	
33	Margas Bibi	Zahir Shah	GGPS Bar Gokand	GGPS Bikand	
34	Nahid Parveen	Parvez Khan	GGPS Bajkatta	GGPS Budal	
35	Zahida	Haji Mohammad	GGPS Diwana Baba -2	GGPS Chalandrai	
36	Irshad Begum	Said Akbar	GGPS Dgai	GGPS Chanar	
37	Sultan Zarin	Mirza Shah	GGPS Chanar	GGPS Chanar	
38	Shaheen	Nazir Mohammad	GGPS Pacha Kalay-2	GGPS Char	

S.No	Name of Teacher	Father ,s /Husband Name	Present School	Place of Posting	Remarks
37	Malkiat	Bashir Ahmad	GGPS Pacha Kalay-2	GGPS Charai	
38	Muhbiba	Mir Hassan	GGPS Totalai	GGPS Charorai	
39	Zakia	Masal Khan	GGPS Cheena Dherai	GGPS Cheena Dherai	
40	Saeeda Akhtar	Fazli Rabbi	GGPS Chinglai	GGPS Chinglai	
41	Musarrat Sultana	Badshah Khan	GGPS Dagai	GGPS Dagai	
42	Shehnaz	Usman Shah	GGPS Daggar	GGPS Daggar	
43	Shazia Qadir	Ghulam Qadar	GGPS Dakara	GGPS Dakara	
44	Kalloom Bibi	Abdul Shakoor	GGPS Totalai	GGPS Dand Maira	
45	Muslim Jehan	Abdul Ghani	GGPS Dagai	GGPS Dandi Kot	
46	Rahmat-Bibi	Abdul Majeed	GGPS Dagai	GGPS Dargalai	
47	Shakila Naz	Zarin Khan	GGPS Bajkatta	GGPS Diwana Baba No 1	
48	Bakhr Shera	Ayub Khan	GGPS Diwana Baba Ziarat	GGPS Diwana Baba Ziarat	
49	Lazilat	Adalat Khan	GGPS Malak Pur	GGPS Dukada	
50	Norin Gul	W/o Fazal Qadar	GGPS Elai	GGPS Elai	
51	Shamim Bibi	W/o Fayaz Khan	GGPS Malak Pur	GGPS Elum	
52	Musarrat Kausar	W/o Shamsur Rehman	GGPS Ganshal	GGPS Ganshal	
53	Tajamul Kausar	Miran Shah	GGPS Gharib Abad	GGPS Gharib Abad	
54	Shahat Begum	W/o Abdul Nasir	GGPS Ghazi Khanay	GGPS Ghazi Khanay	
55	Shamim Bibi	Azizur Rehman	GGPS Ghazi Kot	GGPS Ghazi Kot	
56	Shazia Bibi	Amir Hameed	GGPS Ghurghushto	GGPS Ghurghushto	
57	Khalida	Itbar Gul	GGPS Girarai	GGPS Girarai	
58	Musarrat Naz	Mohammad Khan	GGPS Giro	GGPS Giro	
59	Sabiha	W/o Hidayatur Rehman	GGPS Gul Bandai	GGPS Gul Bandai	
60	Husan Bibi	Noor Habib	GGPS Batara	GGPS Gulono Bawrai	
61	Kalloom Akhtar	Zarin Shah	GGPS Nara	GGPS Gumbat	
62	Tahira Yasmin	W/o Muhammad Shah Rume	GGPS Hal	GGPS Hal	
63	Azra Begum	Bilal Iqbal	GGPS Hisar	GGPS Hisar	
64	Farida Begum	Gul Mohammad	GGPS Chinglai	GGPS Jali Dand	
65	Rahmul Sheda	W/o Abdul Shakoor	GGPS Jang Dara KK	GGPS Jang Dara KK	
66	Kalloom Bibi	Abdul Wahab	GGPS Batai	GGPS Jowar No 1	
67	Gul-Bano	Azizur Rahman	GGPS Jowar No 2	GGPS Jowar No 2	
68	Shehnaz Begum	Said Akbar	GGPS Totalai	GGPS Kadal	
69	Nilum Kumari	Sanat Ram	GGPS Batai	GGPS Kala Bat	
70	Mehnaz Gul	Mohammad Irshad	GGPS Bayee Kalay	GGPS Kala Khala	
71	Khalida	Faiz Rasan	GGPS Kalpanai	GGPS Kalpanai	
72	Basmala	W/O S.Salim Khan	GGPS Nawagai	GGPS Kandaw Patay	
73	Hayat Bibi	Sher Mohammad	GGPS Chinglai	GGPS Kangalai	
74	Asia	Said Wahab	GGPS Kanganr	GGPS Kanganr	
75	Nasim Bibi	W/O Anwar Zeb	GGPS Bara Nawagai	GGPS Kankoi	
76	Nasim Akhtar	Sher Afzal Khan	GGPS Kas Koroono	GGPS Kas Koroono	
77	Lailun Nihar	Amir Jang	GGPS Kas Koroono No 2	GGPS Kas Koroono No 2	
78	Husna Bibi	Manzoorul Haq	GGPS Bara Nawagai	GGPS Kata Kot	
79	Minder Kumari	Jamna Das	GGPS Pacha Kalay-2	GGPS Katkala	
80	Davender Kor	Ome Perkash	GGPS Kawga	GGPS Kawga	
81	Shamshad Begum	Raidullah Shah	GGPS Ketawar	GGPS Ketawar	
82	Nahid Begum	Sultan Zaman Khan	GGPS Ka. Koroono	GGPS Khadar Khan	

Sumayy

S.No	Name of Teacher	Father ,s /Husband Name	Present School	Place of Posting	Remarks
83	Bakht Saba	W/o Muhammad Saleem	GGPS Khail	GGPS Khail	
84	Azina Begum	Sultan Zaman Khan	GGPS Dagai	GGPS Khan Pur	
85	Najmul Huda	Said Farosh	GGPS Koria	GGPS Khanano Dherai	
86	Bibi Majida	Faridul Haq	GGPS Ambela	GGPS Khardag Durmai	
87	Shahida	Ali Gawhar	GGCMS Hisar Tangay	GGPS Khwayakay	
88	Hashmat Begum	W/O Amjad Ali	GGPS Shalbandai -1	GGPS Kingar Galai	
89	Bakht Rawana	Abdul Wahid	GGCMS Bampokha	GGPS Kohay	
90	Fahadia	Hizbullah Khan	GGPS Koria	GGPS Koria	
91	Bakhtun Nisa	Said Layaq Shah	GGPS Bajkatta	GGPS Kot Pander	
92	Rukhsana	Noorullah Khan	GGPS Krapa	GGPS Krapa	
93	Shakila Bibi	Muhammad Ghafoor	GGPS Kulyarai	GGPS Kulyarai	
94	Fazilat Begum	Hazrat Rahman	GGPS Kuz Gokand	GGPS Kuz Gokand	
95	Farhat Ara	Azeem Khan	GGPS Kuz Kalay	GGPS Kuz Kalay	
96	Bakhman Zari	Moaf Khan	GGPS Bajkatta	GGPS Kuz Shamnal	
97	Nagina Bibi	W/o Sher Muhammad Khan	GGPS Kuza Nawagai	GGPS Kuza Nawagai	
98	Gulshan Ara	Mohammad Khan	GGPS Batai	GGPS Laghara	
99	Bibi Shamima	Bahran Shah	GGPS Langar	GGPS Langar	
100	Nasim Akhtar	Amir Nawab	GGPS Pacha Kalay No.1	GGPS Tegantai	
101	Hussan Baha	W/o Zameer Rahman	GGPS Bara Nawagai	GGPS Makhranai	
102	Haliza Muhsina Bibi	W/o Usman Ali	GGCMS Sura	GGPS Mala Sar	
103	Shabnum Bibi	W/o Fayaz Khan	GGPS Malak Pur	GGPS Malak Pur	
104	Shamshad Begum	Mamoor Khan	GGPS Totalai	GGPS Malka	
105	Basmin Begum	Bakhtal Syed	GGPS Mangal Thana	GGPS Mangal Thana	
106	Janat Bibi	Gul Rahim	GGPS Bara Nawagai	GGPS Manjar	
107	Romania	Hussainullah	GGPS Daggar	GGPS Manyarai	
108	Raziat	Ihsanullah Khan	GGPS Shnai Naway Kalay	GGPS Maradu	
109	Hussan Ara	W/o Mustaqim Shah	GGPS Maskipur	GGPS Maskipur	
110	Yasmin	Ibadullah	GGPS Matwanai	GGPS Matwanai	
111	Jehan Ara Bibi	Noorul Huda	GGPS Mekho Khpa	GGPS Mekho Khpa	
112	Ahmad Zari	Abdul Hanan	GGPS Miangano Dnerai	GGPS Miangano Dherai	
113	Maryum Bibi	Khanimullah	GGPS Bajkatta	GGPS Miangano Maira	
114	Janat Nisa	Dawlat Shah	GGPS Jang Dara KK	GGPS Mugh Dara	
115	Zaibun Nisa	W/o Noor Akbar	GGPS Mula Yousaf	GGPS Mula Yousaf	
116	Faowarani Begum	Saifur Rahman	GGCMS Mairaj	GGPS Nagrai	
117	Bakht Mahal	Ghulam Nabi	GGPS Nanse	GGPS Nanse	
118	Noor Jehan	W/O Saied Hamayun	GGPS Shalbandai No 1	GGPS Nara	
119	Shamim Ara	Sher Jang	GGPS Totalai	GGPS Naranj	
121	Nusrat	Shamsud Din	GGPS Naray Tangay	GGPS Naray Tangay	
122	Zeenat	Ihsanullah Khan	GGPS Naway Tangay	GGPS Naway Kalay	
123	Zar Nabia	Jalandar	GGPS Kas Korumana	GGPS Ilogram	
124	Sadia Naz	Fazal Maula	GGPS Pacha Kalay No 1	GGPS Pacha Kalay No 1	
125	Shamim Akhtar	Khybar Khan	GGPS Pacha Kalay No 2	GGPS Pacha Kalay No 2	
126	Aysha Bibi	Mursalin	GGPS Kas Korumana	GGPS Pak Banr	
127	Tanwant Kor	Navender Lal	GGPS Panjtar	GGPS Panjtar	
128	Hidayat	Afarin	GGPS Parshalai	GGPS Parshalai	
129	Razia Begum	W/o Nasrullah Khan	GGPS Qadar Nagar	GGPS Qadar Nagar	

S.No	Name of Teacher	Father ,s /Husband Name	Present School	Place of Posting	Remarks
130	Parveen	Gul Ghazan	GGPS Qasim Khel	GGPS Qasim Khel	
131	Zakira	Naseeb Gul	GGPS Sunigram	GGPS Rega	
132	Bakhtia	Dawood Shah	GGPS Bajkatta	GGPS Riyal	
133	Nusrat Begum	Shah Zaman Khan	GGCMS Sultan Was	GGPS.Salarzo Maira	
134	Mumlika Begum	W/o Muhammad Ishaq	GGPS Sawawai	GGPS Sawawai	
135	Parveen Akhtar	Sher Jang Khan	GGPS Totalai	GGPS Shadam	
136	Bibi Nazikat	Abdul Hameed	GGPS Panjtar	GGPS Shagai	
137	Safia Begum	Faiz Mahinood	GGPS Shalbandai No 1	GGPS Shalbandai No 1	
138	Zulma Bibi	W/o M.Munir	GGPS Shalbandai No.2	GGPS Shalbandai No 2	
139	Shaheen Akhtar	Khaliq Dad	GGPS Shamshi Kotay	GGPS Shamshi Kotay	
140	Kaniz Fatima	Sarfaroosh Khan	GGPS Sharshamo Tangay	GGPS Sharshamo Tangay	
141	Farida Begum	W/o Fazal Qayum	GGPS Sher Gar	GGPS Sher Gar	
142	Hidayat	Ihsanullah	GGPS Shnai Naway Kalay	GGPS Shnai Naway Kalay	
143	Rafaqat Begum	Muhammad Yousaf	GGPS Sowarai	GGPS Sowarai	
144	Tabassum Begum	W/O Shahid Aslam	GGPS Shamshi Kotay	GGPS Sro	
145	Bakhti Sewa	Inayatullah Khan	GGPS Sunigram	GGPS Sunigram	
146	Shazia Khanum	Abdul Wahid	GGPS Surkhaw Banda	GGPS Surkhaw Banda	
147	Shagufta Naz	Said Hakim Shah	GGPS Takhta Band	GGPS Takhta Band	
148	Dalhaja	Saifoor	GGPS Diwana Baba No 1	GGPS Tangora	
149	Bibi Amina	W/o Farid Khan	GGPS Tinawlo Dherai	GGPS Tinawlo Dherai	
150	Ulfat Bibi	Ihsanullah	GGPS Torwarsak	GGPS Torwarsak	
151	Ranat Begum	Mir Hawas	GGPS Totalai	GGPS Totalai	
152	Shaheen Begum	W/o Muhammad Sahib	GGPS Bara Nawagai	GGPS Wahid Abad	

TERMS AND CONDITIONS:

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Government/
- 3 Their services can be terminated any time , in case their performance is found un satisfactory during probationary period.
In case of misconduct, they shall be proceeded under the rules framed time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their inter-Seniority on lower post will remain intact.
- 6 No TA / DA is allowed for joining their duty.
- 7 They will give an undertaking to this effect to be recorded in their Service Books accordingly.

SURRAYA BEGUM
DISTRICT EDUCATION OFFICER (F)
BUNER

Dated 22/2/2013

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

- 1 Director Elementary and Secondary Education Khyber Pakhtun Khwa Peshawa.
- 2 District Accounts Buner.
- 3 SDO (F) Primary Buner.
- 4 Officials Concerned.
- 5 Office File.

Surraya Begum
DISTRICT EDUCATION OFFICER (F)
BUNER

22/2/2013

POWER OF ATTORNEY

BEFORE THE HONOURABLE Chairman Service Tribunal Per

Nature of the case Service Appeal

Nasim Bibi
Complainant(s)/Petitioner(s)
Plaintiff(s)/Appellant(s)

VERSUS

Govt of KP
Accused(s)/Respondent(s)
Defendant(s) 4/4

BY THIS POWER OF ATTORNEY, I/WE the said Complainant(s)/Petitioner(s)/Plaintiff(s)/Appellant(s)/Accused(s)/Respondent(s)/Defendant(s) above case hereby make, constitute and appoint **HIDAYATULLAH KHATTAK** Advocate as my/our true and lawful attorney for me/us in my/our name and on behalf to appear, plead, give statement, verify, administer oath and do all lawful acts and things in connection with the said case on my/our behalf or to deal with the execution of any decree or order passed in the case in my/our favour or against me/us by doing all other acts as effectual as I/WE could do my/ourselves, in particular, shall be authorised to withdraw or compromise the case or to refer it to arbitration or to agree to abide by the special oath of any person and to withdraw or receive any documents and money from the court or opposite party and to sign proper receipts and discharge for the same and to engage/appoint any other pleader or pay him as his fee irrespective of my/our success or failure in the case, provided that if the case is heard at any place other than the usual place of sitting of the court, the pleader shall not be bound to attend the same except on my/our agreeing to pay him a special fee to be settled between/among us.

Respondent
Signature. 1 [Signature] 2 _____ 3 _____

ATTESTED AND ACCEPTED on _____
[Signature]
HIDAYATULLAH KHATTAK
Advocate High Court

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 375 /ST Dated 16 / 2 / 2017


To

The District Education Officer (F),
Government of Khyber Pakhtunkhwa,
Bunir.

Subject: - **JUDGMENT**

I am directed to forward herewith a certified copy of Judgement dated 7.1.2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.