


FORM OF ORDER SHEET

Court of _____

Appeal No. 1831/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/09/2023	<p>The appeal of Mst. Saadia Bibi resubmitted today by Mr. Mir Zaman Safi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>13.09.2023</u></p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mst. Sandia Ribi PST GGPS Gandhi Shaib Khan No. 2 Larki Morwat received today i.e. on 04.09.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexure-E of the appeal is illegible which may be replaced by legible/better one.
- 2- Sub-rule-4 of rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974 requires that every civil servant to whom the relief claimed may affect shall also be shown as respondent.

No. 3158 /S.T.

Dt. 5/9 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mir Zman Safi Adv.
High Court Peshawar.

Note:

Objection No. 1 has been removed while as per objection No. 2 appeal of the appellant has not affect right of any individual. Hence re-submitted today dated 11.09.2023.

M. Zman Safi
11/09/2023.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 83 /2023

SAADIA BIBI

VS


EDUCATION DEPTT:

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APPELLANT

THROUGH:


MIR ZAMAN SAFI
ADVOCATE

Office: Room No. 6-E, 5th Floor,
Rahim Medical Centre, Hashtnagri,
Peshawar.
Cell: 0333-9991564

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 1831 /2023

Mst; Saadia Bibi, PST (BPS-12),
GGPS Gandhi Sahib Khan No.2, District Lakki Marwat.....APPELLANT

VERSUS

- 1- The Secretary, (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director, (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (F), District Lakki Marwat.

.....RESPONDENTS

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 13.04.2023 WHEREBY JUNIORS TO THE APPELLANT HAVE BEEN PROMOTED TO THE POST OF SPST (BPS-14) WHILE THE APPELLANT HAS BEEN IGNORED FROM THE SAME AND AGAINST NO ACTION TAKEN ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the impugned Notification dated 13.04.2023 may very kindly be modified/rectified to the extent of promotion of appellant to the post of SPST (BPS-14) with all consequential benefits. Any other relief which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

Briefs facts of the present appeal are as under:-

- 1- That the, appellant was initially inducted in the respondent Department as PST (BPS-12) being deceased employee daughter on regular basis vide order dated 03.10.2017. Copy of the appointment order is attached as annexure.....A.
- 2- That after appointment the appellant took over the charge against her respective post and started performing her duty at the concerned station quite efficiently and upto the entire satisfaction of her superiors.

- 3- That during service of the appellant, those employees who were appointed against the posts of PST (BPS-12) on adhoc basis were regularized vide Notification dated 10.03.2018 in light of the Khyber Pakhtunkhwa Elementary and Secondary Education (Appointment and Regularization of services) Act, 2018. Copies of the Notification and Act are attached as annexure.....**B & C.**
- 4- That it is pertinent to mention that the respondent department conducted Departmental Promotion Committee and as such vide impugned Notification dated 13.04.2023 promoted those employees to the post of SPST (BPS-14) who were regularized under the above mentioned regularization Act, 2018 and as such all of those employees are junior in all intents to the appellant as per law and rules but inspite of that the appellant has been ignored from promotion to the post SPST (BPS-14) in the said DPC. Copies of the impugned Notification and seniority list are attached as annexure.....**D & E.**
- 5- That the appellant feeling aggrieved from the impugned Notification dated 13.04.2023 preferred departmental appeal before the appellate authority but no reply has been received so far. Copy of the departmental appeal is attached as annexure.....**F.**
- 6- That the appellant feeling aggrieved and having no other remedy but to file the instant service appeal on the following grounds amongst the others:

GROUND:

- A- That the impugned Notification dated 13.04.2023 is against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be rectified/modified to the extent of promotion of the appellant.
- B- That the appellant has not been treated by the respondent department in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- C- That the respondent department acted in arbitrary and malafide manner while issuing the impugned Notification dated 13.04.2023 by ignoring the appellant from promotion to the post of SPST (BPS-14).
- D- That not promoting the appellant to the post of SPST (BPS-14) is clear violation of the principle of natural justice.
- E- That appellant is the senior most employee of respondent department and fully entitle for promotion to the post of SPST (BPS-14) w.e. from the date

when colleagues and junior colleagues of the appellant have been promoted
i.e. 13.04.2023.

F- That the inaction of the respondents by not allowing/granting promotion to the appellant w.e.f. 13.04.2023 to the post of SPST (BPS-14) is violative of Section-9 of the Civil Servant Act, 1973 read with Rule-7 of the (Appointment, Promotion & Transfer) Rules 1989.

G- That as per rules and regulations the appellant is fully entitled for promotion w.e.f 13.04.2023 to the post of SPST (BPS-14) with all consequential benefits.

H- That the impugned Notification dated 13.04.2023 is violative of Article-28(e) of the Constitution of Islamic Republic of Pakistan, 1973.


I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

APPELLANT


SAADIA BIBI

THOROUGH:


MIR ZAMAN SAFI
ADVOCATE

CERTIFICATE:

It is, certified that no other earlier appeal was filed between the parties.


DEPONENT

LIST OF BOOKS:

- 1- CONSTITUTION OF PAKISTAN, 1973.
- 2- SERVICES LAWS BOOKS.
- 3- ANY OTHER CASE LAW AS PER NEED.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. _____ /2023


SAADIA BIBI

VS

EDUCATION DEPTT:

AFFIDAVIT

I Mir Zaman Safi, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this **service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


MIR ZAMAN SAFI,
Advocate
High Court, Peshawar

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE), LAKKI MARWAT.

APPOINTMENT ORDER:-

Consequent upon the recommendation of department selection committee, the appointment below named candidate is hereby order as PST in BPS-12 Rs: (13320-960-42120) plus usual allowances as admissible under the rules on regular basis, being deceased employee daughter under the provision of establishment & administration department circular bearing No. SO (R-VI)/E&D/1-3/2015 dated: 19.04.2016 of the Provincial Government. Terms & conditions given below with immediate effect.

DECEASED EMPLOYEES SON/DAUGHTER QUOTA

S. No.	Name	Father's Name & Address	Post	To be posted at	Remarks
1.	Shagufta Bibi	Late Ayaz khan R/O Deri killa serial Naurang	PST	GGPS. Kotka Ahmad khan	A.V. Post
2.	Saadia Bibi	Late Muhammmad Saeed khan kotka atlas khan serial Naurang	PST	GGPS. Mir Qalam llarama Tala	A.V. Post

(Sabira Parveen)
District education officer,
(Female) Lakki Marwat.

Endst: No. 9210-16/ deceased employee son/daughter dated 03/10/2017.

(Handwritten signature)

A-5

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) LAKKI MARWAT

APPOINTMENT ORDER:-

Consequent upon the recommendation of Departmental Selection Committee, the appointment of below named candidate is hereby ordered as PST in BPS-12. Rs: (13320-960-42120) plus usual allowances as admissible under the rules on regular basis, Being Deceased Employee Daughter, under the provision of Establishment & Administration Department circular bearing No.SO (R-VI)E&AD/1-3/2015 dated: 19-04/2016 of the provincial Government. Terms & conditions given below with immediate effect.

DECEASED EMPLOYEE SON/DAUGHTER QUOTA

S.No	Name	Father's Name & Address	Post	To be posted at	Remarks
1	Shagufta Bibi	Late Ayaz Khan N/O Deri Killa Serai Naurang	PST	GGPS, Kotka Ahmad Khan	A.V.Post
2	Saadia Bibi	Late Muhammad Saeed Khan Kotka Atlas Khan Serai Naurang	PST	GGPS, Mir Qalam Harama Tala	A.V.Post

TERMS & CONDITION:-

1. Their appointment will be considered on regular basis.
2. Their services will be liable to termination on one month notice from either side. In case of resignation without notice one month pay/allowance will be refunded to Government.
3. Their services will be governed by such rules as the Govt. may issue regulations as from time to time.
4. Their services will be terminated at any time in case of their performance are found un-satisfactory during probationary period, in case of misconduct preceded against the Khyber Pakhtunkhwa Govt: Servants (efficiencies and discipline) rules 2011 and the rules framed from time to time.
5. Charge reports should be submitted to all concerned.
6. No TA/DA is allowed.
7. The undersigned will check and verify the certificates/ Degrees of the above named candidate from the concerned Board/ University before the drawl of pay.
8. The appointment is liable to termination if the appointee failed to take over charge within fifteen days of the commencement date.
9. The undersigned reserves the right of amendment in the appointment order in case of a mistake.
10. They are required to produce their health and age certificates from the Medical Superintendent DHQ, Hospital Lakki Marwat.

(Sabira Parveen)
District Education Officer,
(Female) Lakki Marwat.

Endst: No. 9210-16 /Deceased Employee son/daughter Dated 3 / 10 /2017.

Copy to the:-

1. Director (E&S) Education Khyber Pakhtunkhwa, Peshawar.
2. Deputy District Education Officer (Female) Lakki Marwat.
3. District Accounts Officer, Lakki Marwat.
4. Sub Divisional Education Officer Lakki Marwat/Serai Naurang.
5. District Monitoring Officer Lakki Marwat.
6. Head Mistress concerned schools.
7. Candidate concerned.

District Education Officer,
(Female) Lakki Marwat.

RECEIVED
M. Qureshi

B-6

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)

LAKKI MARWAT

PII No. 0969-538080
Fax 0969-538080



Notification.


Under the provision of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), Services of the following Primary School Teachers appointed on adhoc basis on Contract, are hereby regularized in BPS-12, on the same posts in Teaching Cadre on the terms and condition given below with effect from the date of their appointment on the PST post :-

(PST BPS-12)

Sr	KollNo	Name	Address	Total Marks (out of 200)	School	Appointment order No and dated
1	16170011	SedraBehram		109.32	GGPS Bragi	1159-1165 dated: 17-03-2015
2	881700547	SadaifMumtaz	Kotka Atlas Naurang	116.43	GGPS Wanda Naurang	---do---
3	881700038	Noor Shad Bibi	Ahmad Khel	129.5	GGPS No. 1 Sur Band	---do---
4	881700042	Saminia Akhtun	Ahmad Khel	112.30	GGPS No. 2 Sur Band	---do---
5	161701222	GulZarina	Daraka Sulaiman Khel	98.03	GGPS Tajbi Khel Bhattani	---do---
6	881700410	Rohina Bibi	Zin Mali Khel	113.07	GGPS Sadar Abad Ghazi Khel	---do---
7	881700521	Anila Khan	Khawgla wala Isa Khel	123.44	GGPS Wanda Nizami	---do---
8	881700522	ParissAftab	Lakku village samandi	125.11	GGPS Wanda Aurangzeb	---do---
9	881700411	Zarnab Bibi	IAKIMAL AHMAD	92.74	GGPS, Khan Khel Mandozai	1301-07 dated: 13-04-2017
10	881700424	RahilaYousaf	Daraka Sulaiman Khel	88.45	GGPS, Mirza Shah Bhattani	1298-1304 dated: 01-04-2015
11	881700188	Najma Khan	Village Abba Khel	116.86	GGPS No. 2 Abba Khel	1743-51 dated 11-04-2016
12	881700105	Zartaj Bibi	Village Matora	111.85	GGPS MelaMandra Khel No.2	---do---
13	162200050	Roshan	Shakh Quli Khan	101.09	GGPS SaraDarga	---do---
14	882400034	Seemab Gul	Hamid Abad Naurang	104.64	GGPS Nar SarkaiQuli khan	---do---
15	881700041	DureShahwar	Mala Shahab Khel	128.19	GGPS Wanda Kalan	---do---
16	881700082	Asia Kahtoon	Dauo Khel	112.06	GGPS Langer Khel Hindal	---do---
17	881700181	Razia Gul	Mala Shahab Khel	104.23	GGPS Wanda Kalan	---do---
18	882300091	Rifat Ghani	Marmandi Multan	123.46	GGPS Marmandi Multan	---do---
19	882300091	Neelofar	Marmandi Azim	117.56	GGPS MultaniManjiwala	---do---
20	882500091	Farhat Jabeen	Daraki Nam Shah Khel	115.89	GGPS Mughal Manjiwala	---do---
21	882500112	Bibi Aisha	Daraka Sulaiman Khel	89.34	GGPS Azai Mir Bhattani	---do---
22	882600049	Beena Begum	Daraka Sulaiman Khel	70.31	GGPS Landi Mir Salam	---do---
23	882200091	ZakiaMehboob	Taja zai Lakki	127.85	GGPS No.02 Tajazai	---do---
24	881700209	Robina bibi	Taja Zai Lakki	121.2	GGPS No.02 Tajazai	---do---
25	882300071	MehreenHashim	Gul Baz Serai Naurang	137.13	GGPS Sher Jan Abad	---do---
26	881700031	Neelo Bibi	Serai Naurang	122.49	GGPS Sher Jan Abad	---do---
27	882100150	Shazia	Serai Naurang	114.92	GGPS KotkaZarWali khan	---do---

M. J. J.

28	232300021	Safia Qayyum	Serai Naurang	110.57	GGPS Sher Jan Abad	---do---
29	882200072	Rafia Gul	Serai Naurang	109.49	GGPS KotkaSikander Khan	---do---
30	881700083	NayabTabasum	Serai Naurang	107.79	GGPS KotkaSikander Khan	---do---
31	882500022	Laila Gulfam	Serai Naurang	107.64	GGPS Kotka Atlas Khan	---do---
32	882400076	Ulfat Jahan	Serai Naurang	106.46	GGPS Muhammad YarSulaiman Khel	---do---
33	881700197	Bibi AminaAkram	Sheru Khel Lakki	111	GGPS KechiKamar	---do---
34	232300045	NosheenBibi	Behram Khel	90.2538	GGPS Behram Khel No.01	---do---
35	882200052	Safia Hildi	Behram Khel	98.35	GGPS Baiz Khel	do
36	882200052	Sadia Rohim	Dara Pezu	117.33	GGPS WargharPezu	---do---
37	882200051	Sornia Rahim	Dara Pezu	110.71	GGPS WargharPezu	---do---
38	161700157	Robina Bibi	Dara Pezu	103.11	GGPS DaraPezu	---do---
39	882300105	Zakia Minhas	Dara Pezu	99.71	GGPS DaraPezu	---do---
40	882100238	Bibi Hajira	Dara Pezu	98.84	GGPS DaraPezu	---do---
41	161700160	GhanimataNiaz	Lakki/Landiwah	123.41	GGPS SherDilla Jan Landiwah	---do---
42	881700184	Bibi Fatima-tu-Zuhra	Village Mangala	109.73	GGPS SarkatiMichen Khel	---do---
43	882200062	Busrina Rauf	Akbar Killa	129.66	GGPS SahibzadaKhost Nar	---do---
44	882100064	Namrina Sherin	village Mama Khel	110.875	GGPS Naser Khel No.1	---do---
45	881700143	Bibi Nafida	Village Mama Khel	108.96	GGPS SahibzadaKhost Nar	---do---
46	882100058	TauheedRauf	Mama Khel	107.96	GGPS Akbar Killa	---do---
47	882300043	Naila Begum	Village Mama Khel	107.96	GGPS SahibzadaKhost Nar	---do---
48	882100244	Maryam Zaman	Village Mama Khel	102.83	GGPS Gandhi Sahib Naserkhel	---do---
49	882200032	Rani Begum	Mama Khel	102.74	GGPS Akbar Killa	---do---
50	882500062	Fanila Bibi	Mama Khel	99.7	GGPS Gandhi Sahib Naserkhel	---do---
51	882500051	Musarat Yasmin	Mama Khel	99.7	GGPS Gandhi Sahib Naserkhel	---do---
52	882100048	Naurin Akhtar	Baka Khel Tajori	124.4	GGPS TajoriAyubia	---do---
53	161700200	Nazia Bibi	Tajoir	100.78	GGPS TajoriAyubia	---do---
54	161700169	NaheedAkhtar	Mama Khel	108.73	GGPS Nar SahibzadaKhost	1774-82 dated: 12-04-2016
55	161700257	SumeraGul	Kotka Sikandar	105.58	GGPS Kotka Atlas Khan	2069-77 dated: 13-05-2016
56	601700426	Fatima	Abba Khel	110.5	GGPS No. 1 Abba Khel	24-05-2016 dated: 24-05-2016
57	161700001	SumiyaKalsum	Khan Mohallah Tajori	114.4	GGPS TajoriAyubia	2733-41 dated: 04-07-2016
58	881700233	Narmina Rashid	Serai Gambila	101.82	GGPS Gambila Wali Shah	---
59	882500104	Romana Bashir	Gambila	99.5133	GGPS Baist Khel No. 1	---
60	882500104	ZainatBibi	Gandi Umar Chkar	103.96	GGPS AzamBaist Khel	---
61	881700130	Qamar un Nisa	Serai Gambila	98.6	GGPS AzamBaist Khel	---
62	882500026	SeemabBibi	Baist Khel	94.74	GGPS BaistKhel No. 1	---
63	882500072	AsmaReees	Serai Gambila	---	GGPS KotkaMahmood	---
64	---	Nawaz	Lakki Sheed Khel	105.96	GGPS Saeed Khel	---
65	882100144	BeenaGul	Village Nar Khan Khel	114.28	GGPS Wali Khan Maidad Khel	---
66	882100127	SamrinaBibi	Wali Khan Maidad Khel	111.28	GGPS Wali Khan Maidad Khel	---
67	---	---	---	---	---	---

APPROVED


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68	881700026	Shabina Nawaz	Dilasa Khel Begu Khel	106.21	GGCMS Wanda Fatch Khan Shuamli	---do---
69	882400053	Fahmida Akhtar	Nar Pur Dil Begu Khel	96.29	GGPS Abbasa Wazir	---do---
70	882300104	Nargis Naureen	Samandi	87.2	GGCMS Wanda Fatch Khan Shuamli	---do---
71	882100131	Nahid Akhtar	Village Shahbaz Khel	87.71	GGPS Aghzar Khel	---do---
72	882200089	AFTAB ARA	Kolka Mahmood	87.71	GGPS Gambhat Shah	7061-68 dated: 09-08-2016
73	8817000157	Sumaira Gul	Lakki City	125.13	GGPS, Mina Khel	7061-68 dated: 04-05-2017
74	8832000038	Fahmida Shafi	Haqdad Abad Lakki	117.55	GGPS, Mina Khel	7061-68 dated: 04-05-2017
75	8831000198	Zubi Zunash	Mina Khel Lakki	116.22	GGPS, No.2, Haqdad Abad	7061-68 dated: 04-05-2017
76	8832000150	Secinab Khanum	Lakki City	112.92	GGPS, Mina Khel	7061-68 dated: 04-05-2017
77	8831000253	Mehwish	Lakki City	109.63	GGPS, Gul Wali Abad	7061-68 dated: 04-05-2017
78	8832000045	Shaheen Akhtar	Lakki City	109.20	GGPS, Toti Abad	7061-68 dated: 04-05-2017
79	8831000259	Jeveria Aman	Michan Khel Lakki	123.70	GGPS, Saeed Khel	7061-68 dated: 04-05-2017
80	8817000034	Robina Nazreen	Shoru Khel Lakki City	110.01	GGPS, Ahmad Abad	7061-68 dated: 04-05-2017
81	8835000214	Minhas Begum	Painda Khel Mama Khel	117.86	GGPS, No.2, Naser Khel	7061-68 dated: 04-05-2017
82	8832000011	Sumaira Mumtaz	Dabak Mandra Khel	105.18	GGPS, No.1, Dabak Mandra Khel	7061-68 dated: 04-05-2017
83	8832000041	Manoona Batool	Begu Khel	99.17	GGPS, Karim Jan Begu Khel	7061-68 dated: 04-05-2017
84	8835000058	Shabina Bibi	Langer Khel	128.87	GGPS, Kechi Kamar	7061-68 dated: 04-05-2017
85	8817000118	Sabina Kanwal	Lakki Mina Khel	118.98	GGPS, Kechi Kamar	7061-68 dated: 04-05-2017
86	8835000325	Ambreen Bibi	Lakki Pahar Khel Thal	112.08	GGPS, Kechi Kamar	7061-68 dated: 04-05-2017
87	8835000288	Kiran Hyas	Dallo Khel	131.08	GGPS, Wanda Kafan	7061-68 dated: 04-05-2017
88	8835000408	Jamila Khatoon	Dallo Khel	128.91	GGPS, Landiwah Sher Dilla Jan	7061-68 dated: 04-05-2017
89	8833000157	Amina Gul	Zafraan Abad Scri Naurang	114.09	GGPS, Nar Sultan Mahmood	7061-68 dated: 04-05-2017
90	8835000307	Sadaf Afreen	Saif Abad	111.97	GGPS, Nar Sultan Mahmood	7061-68 dated: 04-05-2017
91	8835000051	Asia Gul	Moh: Hakeem Khel Gandi	134.79	GGPS, No.1, Gandi Khel	7061-68 dated: 04-05-2017
92	8817000068	Amina Gul	Ghazni Khel	107.97	GGPS, Gulbaz Dehqan	7061-68 dated: 04-05-2017
93	8835000109	Nabila Latif	Quli Khan	104.37	GGPS, Sarkai Quli Khan	7061-68 dated: 04-05-2017
94	8835000370	Zeenat Bibi	Hafiz Khan Khel	82.66	GGPS Sarkai Quli Khan	7061-68 dated: 04-05-2017
95	8833000149	Rashid ul Nisa	Moh: Michan Khel	100.69	GGPS Wanda Samandi	7061-68 dated: 04-05-2017
96	8831000175		Moh: Haqdad Abad	95.9	GGPS Wanda Samandi	7061-68 dated: 04-05-2017
97	8831000145	Shumaila Nawaz	Village Begu Khel	104.000000001	GGCMS Wanda Fatch Khan (S)	7061-68 dated: 04-05-2017
98	8835000161	Farzana Hasan	Moh: Banq Khel Tajori	111.64	GGPS Umar Dariz Tajori	7061-68 dated: 04-05-2017
99	8835000149	Bibi Shazia	Akbar Kila	118.45	GGPS No. 5 Aha Khel	7061-68 dated: 04-05-2017
100	2332000444	Samrina Kifayat	Shahbaz Khel	130.42	GGPS Aghzar Khel	7061-68 dated: 04-05-2017
101	8835000069	Khalida Jabeen	Kheru Khel Pacca	144.58	GGPS No. 1 Kheru Khel Pacca	7061-68 dated: 04-05-2017
102	8832000015	Munazzam Bibi	Hayat Khel	117.86	GGPS Kutli Khel	7061-68 dated: 04-05-2017
103	8817000035	Sadiqa	Masha Mansoor	117.53	GGPS No. 2 Masha Mansoor	7061-68 dated: 04-05-2017
104	2331000178	Secinab Abbas Khan	Masha Mansoor	94.42	GGPS No. 1 Masha	7061-68 dated: 04-05-2017

UNREGISTERED

106	8835000164	Ambrin	Nar Bakhmal Ahmadzai	117.83	GGPS Nar Sohrab Singh	7358-65 dated: 24-05-2017
107	8831000076	Saima Gul Mumtaz	Nar Abu Samand Gegu Khel	110.77	GGPS Nar Sahib Khan	7358-65 dated: 24-05-2017
108	8833000161	Samrin Sattar	Saeed Khel Lakki	109.28	GGPS Saeed Khel Branch	7358-65 dated: 24-05-2017
109	8817000082	Memoom Bibi	Masha Mansoor		GGPS Kuti Khel	7358-65 dated: 24-05-2017
110	8833000072	Kiran Anjum	Baist Khel	124.34	GGPS AZAM BAIST KHEL	7369-76 dated: 24-05-2017
111	8833000075	Bushra Minhas	Baist Khel	116.54	GGPS AZAM BAIST KHEL	7369-76 dated: 24-05-2017
112	8831000070	Salma Ara	Kotka Mahmood	108.79	GGPS BAIST KHEL	7369-76 dated: 24-05-2017
113	8831000040	Maryam Iqbal	Ozaki Mala Khel	106.94	GGPS GAMBILA ABDUR RAZAQ	7369-76 dated: 24-05-2017
114	8831000167	Shabnam Bibi	Gandi Umar Chikar	106.32	GGPS GAMBILA ABDUR RAZAQ	7369-76 dated: 24-05-2017
115	8832000044	Zeenat Bibi	Sher Khel Baist Khel	106.29	GGPS BAIST KHEL	7369-76 dated: 24-05-2017
116	8832000051	Bibi Asma	Kotka Mahmood	102.88	GGPS KOTKA MAHMOOD	7369-76 dated: 24-05-2017
117	8833000143	Shagufta Bashir	Baist Khel	100.29	GGPS HARAMA TALA WAKIL	7369-76 dated: 24-05-2017
118	8833000179	Khusho Bashir	Baist Khel	99.95	GGPS KOTKA MAHMOOD	7369-76 dated: 24-05-2017
119	8832000336	Naila Hasan	Mamtal Abad Naurang	121.11	GGPS SERAI NAURANG	7369-76 dated: 24-05-2017
120	1635000618	Shazla Sikandari	Mohallah Hafiza Abad Naurang	109.66	GGPS NAR FAQIR MASOOM	7369-76 dated: 24-05-2017
121	8832000193	Saila Hasan	Mumtaz Abad Naurang	108.08	GGPS KOTKA SHER JAN	7369-76 dated: 24-05-2017
122	1635000731	Fatima Zuhra	Serai Naurang	103.78	GGPS SHER ASLAM	7369-76 dated: 24-05-2017
123	1631000423	Sadaf	Kotka Khan Bahadur	101.32	GGPS NAR MUHAMMAD KUNDI	7369-76 dated: 24-05-2017
124	8831000132	Naila Hamid	Serai Naurang	100.45	GGPS NAR FAQIR MASOOM	7703-09 dated: 12-07-2017
125	8832000332	Humceda Ahmad	Samandi	92.91	GGPS Wanda Fateh Khan (S)	1461-67 dated: 07-03-2018

TERMS & CONDITIONS.

1. The regularization will not be in favour of those, who have not taken over charge or has remained absent from duty or resign from service and also not for those who are under disciplinary proceedings.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. The employees whose services are regularized under The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) or in the process of attaining service at the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who are in service on regular basis on the commencement of The Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No.1 of 2018), and shall also rank junior to such other persons, if any, who, in

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The seniority interest of the employees, whose services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiation in such service or cadre:

(Sabra Parveen)
District Education Officer
(Female) Laki Marwat

Subst: No. 1675-82 /Regularization/2018/PST Dated Laki Marwat the 10/03/2018.
Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. District Education Officers Concerned.
4. District Accounts Officer Concerned.
5. Official Concerned.
6. PS to the Secretary to Govt. Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File.


District Education Officer
(Female) Laki Marwat

APR 10 2018


AN
ACT

C-11

to provide for the appointment and regularization of the services of certain employees appointed on adhoc or contract basis or appointed in certain projects in the Elementary and Secondary Education Department in the Province of the Khyber Pakhtunkhwa.

WHEREAS it is expedient to provide for the appointment and regularization of the services of certain employees appointed on adhoc or contract basis or appointed in certain projects in the Elementary and Secondary Education Department in the Province of the Khyber Pakhtunkhwa, in the public interest;

It is hereby enacted as follows:

1. Short title, application and commencement.—(1) This Act may be called the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education Department (Appointment and Regularization of Services) Act, 2017.

(2) It shall apply to all the employees in the Elementary and Secondary Education Department, as defined in clause (c) of sub-section (1) of section 2 of this Act.

(3) It shall come into force at once and it shall be deemed to have taken effect from the date of the initial appointment of the employees as referred to in clause (c) of sub-section (1) of section 2 of this Act.

2. Definitions.—(1) In this Act, unless the context otherwise requires,-

(a) "Commission" means the Khyber Pakhtunkhwa Public Service Commission;

(b) "contract appointment" means appointment of a duly qualified person for a specific period made otherwise than in accordance with the prescribed method of recruitment;


(c) "employees" mean duly qualified persons,-

(i) who are appointed as teachers on adhoc or contract basis by the Government after 2013 through National Testing Service but does not include the teachers engaged on work charge basis or who are paid out of contingencies;

(ii) who are appointed in the projects on contract basis in accordance with the project policy; and

(iii) who are appointed as Junior Clerk in the Elementary and Secondary Education Department by Government after 2013 through National Testing Service;

(d) "Government" means the Government of the Khyber Pakhtunkhwa;


M. J. Khan

(e) "law or rule" means the law or rule for the time being in force governing the selection and appointment of civil servants;

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(f) "project" means,-

- (i) IT/Computer Teachers in Computer Labs Projects in Khyber Pakhtunkhwa (Phase-II);
- (ii) establishment of five hundreds (500) IT Labs in Government High and Secondary Schools in Khyber Pakhtunkhwa; and
- (iii) establishment of five hundreds (500) IT Labs in Government High Schools in Khyber Pakhtunkhwa (Phase-III); and

(g) "teacher" means a teacher of primary, middle, secondary or higher secondary school.

(2) The expressions "ad hoc appointment" shall have the same meaning as respectively assigned to them in the Khyber Pakhtunkhwa Civil Servants Act, 1973 (Khyber Pakhtunkhwa Act No. XVIII of 1973).

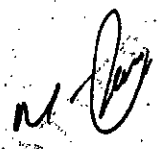
3. **Regularization of services of employees.**—(1) Notwithstanding anything contained in any other law or rules, the employees, who hold posts till the commencement of this Act, shall be deemed to have been validly appointed on regular basis from the day of the initial appointment; provided that-

- (i) they possess the same qualification and experience required for a regular post;
- (ii) they have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground, before the commencement of this Act; and
- (iii) the service promotion quota of all service cadres shall not be affected.

(2) The services of the employees shall be deemed to have been regularized only on the publication of their names in the official Gazette.

4. **Determination of seniority.**—(1) The employees whose service are regularized under this Act or in the process of attaining service at the commencement of this Act, shall rank junior to all other employees belonging to the same Cadre, who are in service on regular basis on the commencement of this Act, and shall also rank junior to such other persons, if any, who, in pursuance of the recommendation of the Commission made before the commencement of this Act, are to be appointed to the Cadre, irrespective of their actual date of appointment.

(2) The seniority inter-se of those employees, whose services are regularized under this Act within the Cadre, shall be determined on the basis of their continuous service in Cadre:



Provided that if the date of continuous service in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

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5. **Overriding effect.**--- Notwithstanding anything to the contrary contained in any other law or rules for the time being in force, the provisions of this Act shall have an overriding effect and the provisions of any such law or rules to the extent of inconsistency to this Act shall cease to have effect.

**BY ORDER OF MR. SPEAKER
PROVINCIAL ASSEMBLY OF KHYBER
PAKHTUNKHWA**

(INAMULLAH KHAN)

Provincial Assembly of Khyber Pakhtunkhwa

●●●●●

INAMULLAH KHAN



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) LAKKI MARWAT

Pb & Fax: (0969) 538080, Email: deo@lakki@gmail.com

NOTIFICATION/OFFICE ORDER:-

Consequent upon the recommendation of Departmental Promotion Committee in its meeting held on 18-01-2023, the following below named Primary School Teachers (PST) BPS-12 are hereby promoted to the posts of Senior Primary School Teachers (SPST) BPS-14@ (22530-1740-74730) plus usual allowances as admissible under the rules on regular basis under existing policy of Govt. of Khyber Pakhtunkhwa Elementary & Secondary Education Notification No. SO (PE) 4-5/SSRC/meeting/2012/teaching cadre dated: 13-11-2012 on the terms and condition given below with immediate effect and further posted as SPST in the school noted against each.

S#	Sen#	Name	Present School as PST	Place of posting as SPST
1	24	Jamila Akhtar	GGPS Lakki Sneed Khel	GGPS Lakki Saced Khel
2	47	Rukhsana Bibi	GGPS Nar S.Maidad Khel	GGPS Nar S.Maidad Khel
3	53	Niaz Bibi	GGPS Nar Sarkai Quli Khan	GGPS Nar Sarkai Quli Khan
4	62	Nighat Seemab	GGPS Serai Naurang	GGPS Serai Naurang
5	64	Shabnum Nisa	GGPS Serai Naurang	GGPS Textile Mills
6	68	Shakila Bibi	GGPS Kharji Behramkhel No: 02	GGPS Kharji Behramkhel No: 02
7	69	Robina Kausar	GGPS Marmundi Multan	GGPS Marmundi Multan
8	70	Bakhtnana	GGPS Baz Kila	GGPS Harama Tala Wakil
9	71	Saadia Khan	GGPS No.01 Ghazni Khel	GGPS Kotka Muhammad Nawaz Ghazni Khel
10	72	Shagufta Kanwal	GGPS Wanda Banochi	GGPS Wanda Banochi
11	73	Zaheen Begum	GGPS Mama Khel No.01	GGPS Mama Khel No.02
12	74	Shakila Bibi	GGPS Gulbaz Dehqan	GGPS Gulbaz Dehqan
13	75	Fehmida Bibi	GGPS Langer khel Hindal	GGPS Masti Khel
14	76	Roman Gul	GGPS Nar Kala Khan	GGPS Nar Kala Khan
15	77	Hajra Musarrat	GGPS Muhammad Hassan Shahbaz Khel	GGPS Tabi Murad No:01
16	78	Samin Ara	GGPS Haqdad Abad No.01	GGPS Haqdad Abad No.01
17	79	Shamim Begum	GGPS Kotka Ayaz	GGPS Kotka Ayaz
18	81	Farhat un Nisa	GGPS Langer Khel Hindal No: 02	GGPS Wanda Kalan
19	82	Shakiba	GGPS Ghuncha Khan	GGPS Ghuncha Khan
20	83	Nadia Parveen	GGPS Nar Gul Hassan Shah	GGPS Gambila Abdul Razzaq
21	84	Sobia Gul	GGPS Qimat Manji Wala	GGPS Qimat Manji Wala
22	85	Kanwal Arooj	GGPS Wanda Amir	GGPS Achu Khel
23	86	Nusrat Shaheen	GGPS Pahar Khel Pacca 01	GGPS Pahar Khel Pacca 01
24	87	Afshan Bibi	GGPS No.01 Titter Khel	GGPS No.01 Titter Khel
25	88	Ume Salma	GGPS No.03 Ghazni Khel	GGPS Wanda Kalan
26	89	Farida Yasmeen	GGPS Gulbaz Dehqan	GGPS Gulbaz Dehqan
27	90	Gul Rubani	GGPS Mama Khel No.02	GGPS Mama Khel No.02
28	91	Shahida Bibi	GGCMS Aba Khel	GGCMS Aba Khel
29	92	Asma Dilawar	GGPS Mela Mandra Khel No:03	GGPS Mela Mandra Khel No:03
30	93	Tania Aman	GGPS Samandar Titter Khel	GGPS Badni Khel
31	94	Shagufta Naz	GGPS Marmandi Multan	GGPS Nar Muhammad Ghazni Khel
32	96	Anees Fatima	GGPS Dabak Mandra Khel No:01	GGPS Dabak Mandra Khel No:01
33	97	Fehmida Amir	GGPS Nawar Khel	GGPS Nawar Khel
34	98	Nahid Akhtar	GGPS Kotka Sher Aslam	GGPS Kotka Sher Aslam
35	99	Nadia Sultana	GGPS Nar Bakhmal Ahmad Zai	GGPS Nar Bakhmal Ahmad Zai
36	100	Nadia Begum	GGPS Ahmad Abad	GGPS Ahmad Abad
37	101	Qamar Gula	GGPS Kaki Jan	GGPS Kotka Zarwali Khan
38	102	Shagufta Nazmeen	GGPS Mangala No 2	GGPS Mangala No 2
39	103	Paras Aftab	GGPS Kotka Ghuncha Khan	GGPS Kotka Ghuncha Khan
40	104	Noor Shaad	GGPS Ahmad Abad	GGPS Ahmad Abad
41	105	Sadaf Mumtaz	GGPS Kotka Atlas Khan	GGPS Kotka Atlas Khan
42	106	Samina Akhter	GGPS Karim Jan Begu Khel	GGPS Karim Jan Begu Khel
43	108	Rohina Bibi	GGPS No.01 Titter Khel	GGPS Ghazi Khel No:01
44	109	Hamida Bibi	GGPS Pahar Khel Thal	GGPS Wanda Laghman
45	110	Gul Zarina	GGPS Feroz Khan Sulaiman Khel	GGPS Feroz Khan Sulaiman Khel
46	111	Rahila Yousaf	GGPS Sargara Muhammad Khan	GGPS Sargara Muhammad Khan
47	112	Zarnab Bibi	GGPS Kotka Muhammad Sharif	GGPS Kotka Muhammad Sharif
48	113	Amina Bibi	GGPS Wanda Simu	GGPS Wanda Simu
49	114	Rabia Bibi	GGPS Wanda Nizami	GGPS Wanda Nizami
50	115	Raham Bibi	GGPS Shahtora Takhti Khel	GGPS Shahtora Takhti Khel

APPROVED
M J

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TERMS & CONDITION:-

1. They would be on probation for a period of one year extendable for another one year.
2. Charge report should be submitted to all concerned.
3. No TA/DA is allowed for joining her duty.
4. They will be governed by such rules and regulation as may be issued from time to time by the Government.
5. Their service can be terminated at any time, in case their performance found unsatisfactory during probationary period. In case of misconduct, they shall be preceded under the rule framed from time to time.
6. The DDO concerned will check and verify the certificates/degrees of the above named candidates from the concerned board/university before drawl their salaries/pays.
7. They will give an undertaking to be recorded in their service books to the effect that if any over payment or made to them in light of this order will be recovered and if they are wrongly promoted they will be reverted.
8. Their inter-se-seniority will remain intact on lower post.

(Farzana Sardar)
District Education Officer
(Female) Lakki Marwat.

Endst: No: 2301-08 /PST to SPST Promotion/2023 Dated: 13/04/2023.
Copy to the:-

1. Director (E&S) Education Khyber Pakhtunkhwa, Peshawar.
2. District Monitoring Officer (EMA) Lakki Marwat.
3. Dy: DEO (F) Local office.
4. District Accounts Officer Lakki Marwat.
5. Sub-Divisional Education Officer (F) concerned.
6. ASDEO circle concerned schools.
7. PSHT Concerned School
8. Master File

District Education Officer,
(Female) Lakki Marwat.

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OFFICE OF THE DISTRICT EDUCATION OFFICER (F) LAKKI MARWAT

FINAL SENIORITY LIST OF PST BPS-12 & 13 FEMALE LAKKI MARWAT

S#	Name	Father's Name	Personal No.	BPS	DOB	Date of 1 st apptt: As PST	Qualification		Apptt: Score of candidate	Present School
							Academic	Professional		
1.	Nazia Bibi	Ghulam Rasool	293924	13	8.1.1961	01.11.1981	SSC	PTC		
40.	Saima Begum	Sajid Shah	294444	13	10.1.1975	09.02.1994	SSC	PTC		GGPS Jabbi Khel
41.	Rukhsana Afzal	Muhammad Afzal	297131	13	03.02.1974	20.05.1977	SSC	PTC		
43.	Bibi Sakina	Ghulam Muhammad	294075	13	04.12.1964	02.09.1995	SSC	PTC		GGPS Haqdad Abad
44.	Amir Sardara	Muhammad Khan	293184	12	01.03.1966	02.09.1995	SSC	PTC		GGPS Haqdad Abad
45.	Farukh Yasmin	Zulfiqar Ahmad	296227	13	02.03.1973	02.09.1995	SSC	PTC		GGPS Wanda No.3
109.	Saadia Bibi	Muhammad Saeed Khan	834580	12	14.03.1996	03.10.2017	BA	PTC	Deceased Quota	GGPS Mitto Ghazni Khel, No.2
110.	Paras Aftab	M. Aftab Khan	747996	12	01.03.1988	17.03.2015	MA	PTC CT	129.50	GGPS Kotka Ghuncha Khan
111.	Noor Shad	Mir Ahmad	745113	12	15.11.1990	18.03.2015	MSC	Med, CT PTC	129.5	GGPS Ahmad Abad
112.	Sadaf Mumtaz	Mumtaz Khan	745151	12	08.02.1987	18.03.2015	MA	BEd PTC	116.43	GGPS Wanda Naurang
113.	Samina Akhtar	Muhammad Yaqoob Khan	749437	12	04.01.1987	18.03.2015	MA	PTC CT MEd	112.39	GGPS Sarband No.1
114.	Anila Khan	Abdur Rasheed Khan	750284	12	06.01.1990	18.03.2015	MSC	PTC	112.19	GGPS Wanda Nizami
115.	Rohina Bibi	Muhammad Yousaf	744700	12	12.03.1984	02.04.2015	MA	Med CT		GGPS Sader Abad Ghari Abad
116.	Rashida Bibi	Ghulam Saeed	743653	12	03.05.1987	18.03.2015	MA	PTC BEd		GGPS Pahar Khel No.4
119.	Zarnab Bibi	Raza Khan	747825	12	24.12.1993	14.04.2015	BA	PTC		GGPS Khan Khel Mandozai

OFFICE OF THE INSPECTOR GENERAL
 FEDERAL BUREAU OF INVESTIGATION
 (COMMUNIST INFLUENCE LIST) - PART 1

Number	Full Name	Present's MRS	BOB	Date of Birth	at FBI	Employment	Classification	Special Source of Evidence	Present Source
1	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
2	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
3	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
4	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
5	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
6	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
7	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
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9	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
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11	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
12	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
13	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
14	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
15	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
16	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
17	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
18	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
19	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
20	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
21	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
22	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
23	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
24	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
25	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
26	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
27	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
28	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
29	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
30	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
31	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
32	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
33	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
34	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
35	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
36	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
37	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
38	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
39	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
40	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
41	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
42	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
43	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
44	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
45	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
46	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
47	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
48	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
49	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.
50	ALAN B. BROWN	13	1903	01/11/1901	NY	PIC		GALEN, W. H. S. N. I.	GALEN, W. H. S. N. I.

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Sl. No.	Name	Age	Sex	Religion	Marital Status	Occupation	Income	Assets	Liabilities	Remarks
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Employee Name	Employee ID	Employee Title	Grade	Rate	Rate of Pay	Rate of Pay	Rate of Pay	Rate of Pay	Rate of Pay	Rate of Pay
John M. Smith	12345	Manager	12	\$1200	\$1200	\$1200	\$1200	\$1200	\$1200	\$1200
Jane D. Doe	67890	Analyst	11	\$1000	\$1000	\$1000	\$1000	\$1000	\$1000	\$1000

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Handwritten signature and text: "Handwritten signature" and "SDSOCS".



102-058801

THE DIRECTOR, ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUYNKHW, PESHAWAR.
(Departmental Appellate Authority)

Sadia Bibi PST, GPS Gundi Sahib Khan No. 2 Serai Naurang, R/O Kotka
Atlas Khan, Serai Naurang, District Lakki Marwat.Appellant

Versus

1. The District Education Officer (Female) Lakki Marwat.
2. Paras Aftab, PST GGPS Kotka Ghuncha Khan now SPST
3. Noor Shah PST GGPS Ahmad Abad now SPST
4. Safir Mumtaz, PST Kotka Atlas Khan now SPST
5. Samina Akhtar PST GGPS Karim Jan Begu Khel now SPST
6. Rohina Bibi PST GGPS No. 1 Titter Khel now SPST GGPS Ghazi Khel No. 1
7. Gul Zarina PST GGPS Feroz Khan Suleman Khel now SPST.
8. Rahila Yousaf PST GGPS Sargara Muhammad Khan now SPST.
9. Zarnab Bibi PST GGPS Kotka Muhammad Sharif now SPST.

.....Respondents

Subject: DEPARTMENTAL APPEAL UNDER RULE 4 OF THE SERVICE
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER NO.
2301-08/PST to SPST Promotion/2023 dated 13.04.2023 READ
WITH DPC MEETING HELD ON 18.01.2023 PASSED BY DEO
(FEMALE) LAKKI MARWAT VIDE WHICH THE APPELLANT WAS
NOT PROMOTED TO THE POST OF SPST BPS-14

Respected Sir,

I have the honor to submit that I am serving as a PST BPS-12 in
GGPS Gundi Sahib Khan No. 2 Tehsil Serai Naurang, District Lakki Marwat
aggrieved from the above mentioned impugned order and hereby submit
departmental appeal under Rule 4 of the Service Tribunal Act, 1974, as under:-

FACTS

1. That the appellant is the bonafide resident of Village Kotka Atlas Khan
Tehsil Serai Naurang District Lakki Marwat.
2. That the appellant was appointed as a PST BPS-12 under deceased
employees sons quota as provided in Rule 10 (4) of the Khyber
Pakhtunkhwa, Appointment, Promotion & Transfer) Rules, 1989 on
regular basis vide District Education Officer (Female) Lakki Marwat,
vide District Education Officer (Female) Lakki Marwat Appointment
Order No. 9210-16/Deceased Employee son/daughter dated
03.10.2017 (Photostat copy enclosed as a Annexure A).
3. That the appellant is fully qualified for promotion to the post of SPST
BPS-14 having prescribed qualification and higher education as
Master in Pashto.
4. That other colleagues of the appellant who were appointed on contract
basis have been regularized with the following terms and conditions
vide DEO (Female) Lakki Marwat Notification No. 1675-82/
Regularization/2018/PST dated 10.03.2018:-

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- a. The regularization will not be in favour of those who have not taken over charge or has remained absent from duty or resign from service and also of those who are under disciplinary proceedings.
- b. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- c. The employees whose services are regularized under the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No. 1 of 2018) shall rank junior to all civil servants belonging to the same service or cadre, as the case may be, who in service on regular basis on the commencement of the Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No. 1 of 2018) and shall also rank junior to such other persons, if any, who in service.
- d. The seniority interse of the employees, who services are regularized under this Act within the same service or cadre, shall be determined on the basis of their continuous officiating in such service or cadre:

5. Now the respondents No. 2 to 9 junior to the appellant have been promoted to the post of SPST BPS-14 and the appellant have been ignored nor any reasons conveyed to the appellant which is against Rule 8 (4) of the Civil Servant Act, 1973 and Rule 17 of the Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and Para 4 c & d of DEO (F) Lakki Marwat Notification No. 1675-82 dated 10.03.2018 (Photostat copy enclosed as a Annexure B).

6. Due to this very reasons the appellant sustained irreparable loss financially as well as mentally and deprived from due and fundamental rights which is injustice and against the rules/policy, hence the instant appeal on the following grounds:-

- A. That the appellant was basically appointed as a PST 03.10.2017 on regular basis.
- B. That the services of the respondents were appointed on Adhoc basis on contact vide DEO (Female) Lakki Marwat on 10.03.2018 and categorically notified in Para 3 of "TERMS AND CONDITIONS" that they shall rank junior to all civil servants belonging to the same service and cadre as the case may be, who are in service on regular basis on the commencement of Khyber Pakhtunkhwa Employees of the Elementary and Secondary Education (Appointment and Regularization of Services) Act, 2018 (Khyber Pakhtunkhwa Act No. 1 of 2018) as mentioned above.
- C. As evident from the above mentioned rules, regulations and Terms and Conditions, the appellant is senior to the respondents No. 2 to 9 and deserve for promotion to the post of SPST from the date of impugned Notification dated 13.04.2023.
- D. It is also pointed out that the Respondent No. 1 has violation her own terms and conditions and the respondents No. 2 to 9 have illegally promoted to the post of SPST in violation of rules thus the impugned order needs to be partially set aside in the interest of justices.

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E. That the appellant time and again requested the Respondent No, 1 to honour my request and promote the appellant keeping in view her seniority and fundamental rights but in vain hence the instant appeal.

PRAYER

On acceptance of the instant appeal, it is very humbly prayed that:-

1. The impugned order may kindly be set aside partially.
2. That the appellant may very kindly be promoted to the post of SPST BPS-14 from her due seniority position with effect from 13.04.2023.
3. That seniority position may also be awarded to the appellant at the relevant place of seniority.
4. That pay and allowances may also be paid by fixation of pay and allowances in next higher pay grade i.e BPS-14 with effect from 13.04.2023.
5. The appellant may kindly be promoted to the post of SPST BPS-14 with retrospective effect with all back benefits and oblige.

Thanking You Sir,

Yours Humbly Appellant

Dated: 09/05/2023.

Saadia Bibi PST BPS-12
GGPS Gandhi Sahib Khan No. 2
Tehsil Naurang District Lakki Marwat.
CNIC No. 11202-0588019-0
Contact No. 0311-1968020



VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

_____ OF 2023

Saadia Bibi

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Saadia Bibi

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

Dated: ____ / ____ /2023

CLIENT

MIR ZAMAN SAFI
ACCEPTED

MIR ZAMAN SAFI
ADVOCATE

OFFICE:

Room No.6-E, 5th Floor,
Rahim Medical Centre, G.T Road,
Hashtnagri, Peshawar.
Mobile No.0333-9991564
0317-9743003