

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

CM 12(2) CPC No. _____

In

Application No: _____/2023 in Service Appeal No.231/2022


Director Elementary & Secondary Education Department & othersApplicants.

VERSUS

Rehana YasmeenRespondent

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

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR.

C.M 12 (2) CPC No. _____/2023

in

Service Appeal No.231/2022

8381

18-10-23

1. Director E&SED Khyber Pakhtunkhwa Peshawar.
2. Secretary E&SED Khyber Pakhtunkhwa Peshawar.....Applicants

VERSUS

1. Rehana Yasmeen SIPE (BS-18) Wadpaga Peshawar.
2. Mst. Misbah Seema SIPE (BS-18) GGHSS Munawar Shah No. 6 D.I.K.
3. Mst. Raheela Banu SIPE (BS-18) GGHSS No. 5 D.I Khan.
4. Msty. Abda Parveen SIPE (BS-18) GGHSS Malak Pura Abbottabad.
5. Mst. Robeena Shaheen SIPE (BS-18) GGHSS Sikandar Khel Bannu.
6. Mst. Parveen Akhtar SIPE (BS-18) GGHSS Akora Khattak Nowshera.
7. Mst. Sughra Afandi SIPE (BS-18) GGHSS Rustam Khel.
8. Mst. Yahya Begum SIPE (BS-18) GGHSS Pir Pai Nowshera.
9. Mst. Mufeeda Begum SIPE (BS-18) GGHSS Shahbaz Ghari Mardan.
10. Mst. Sameena Akhtar SIPE (BS-18) GGHSS comprehensive Peshawar.
11. Mst Ghazala Naeem SIPE (BS-18) GGHSS Behzad Chakar Kot Kohat.
12. Mst. Shujaat Begum SIPE (BS-18) GGHSS Takht Bahi Mardan.
13. Mst. Baserat Afzal SIPE (BS-18) GGHSS Hatain Mardan.
14. Mst. Sameena Gul SIPE (BS-18) GGHSS Sherazi No. 08 D.I.K
15. Mst. Tasleem Kosar SIPE (BS-18) GGHSS Shah Kot Malakand.
16. Mst. Maryam Rasool SIPE (BS-18) GGHSS Kala Bat Haripur
17. Mst. Shaheen Ali SIPE (BS-18) GGHSS Shawa Swabi.
18. Mst. Mussraj Iqbal SIPE (BS-18) GGHSS Esak Chontra Karak.
19. Mst. Sardar Bibi SIPE (BS-18) GGHSS No.1 Karak.
20. Mst, Sadia Hazrat SIPE (BS-18) GGHSS Kopar Malakand.
21. Mst. Shahida Begum SIPE (BS-18) GGHSS Esak Chontra Karak.....Respondents

PETITION UNDER SECTION 12 (2) CPC, 1908
AGAINST THE ORDER/JUDGMENT DATED
27-07-2023 OF THE HONORABLE SERVICE
TRIBUNAL IN TITLED APPEAL, OBTAINED BY
THE APPELLANT (NOW RESPONDENT) ON
THE GROUNDS OF MISREPRESENTATION
& CONCEALMENT OF MATERIAL FACTS
FROM THIS HONORABLE TRIBUNAL.

PRAYER: - BY ACCEPTANCE OF THE INSTANT APPLICATION, THE ORDER/JUDGMENT DATED 27-07-2023 OBTAINED BY THE APPELLANT (NOW RESPONDENT) ON MISREPRESENTATION & CONCEALMENT OF MATERIAL FACTS FROM THIS HONORABLE TRIBUNAL MAY VERY GRIEVOUSLY BE TO SET-ASIDE/RE-CALLED IN FAVOR OF THE APPLICANTS UNDER THE ABOVE CITED PROVISION OF LAW & IN THE INTEREST OF JUSTICE.

Respectfully Sheweth:-

ON FACTS

1. That the Respondent has invoked the constitutional jurisdiction under Article -212 of the constitution of Islamic Republic of Pakistan, 1973 through filing Service Appeals No. 231-234/2022, whereby, the final seniority list of SIPs (BS-18), stood on 02-03-2021, has been impugned by the appellants with the contention that junior colleges/ the private Respondents have been made senior to the appellants & the same has been decided vide order dated 27-07-2023 by this Honorable Tribunal. (Copies of the order dated 27-07-2023 & Seniority list dated 02-03-2021 are Annx-A & B).

2. That it is pertinent to mention here that vide Notification bearing Endst No. SOG/S&L/1-69/06/Vol-1/DPE/LIB dated 13-11-2007, the provincial Government up graded the post of Director Physical Education (D.P.Es) now Instructor of Physical Education (IPs) from BS-16 to 17 on regular basis for the then existing incumbents who hold Master Degree in the relevant subject in E&SE Department, however, vide para-2 of the Notification ibid their existing seniority was ordered to be remained intact & the DPEs cadre was declared as dying cadre. In this regard para-02 of the Notification ibid is hereby reproduced as under for perusal & ready reference:

(2). "The Librarians & D.P. Es who hold the diploma in the relevant subject will stay in BS-16 till such time, they acquire Master Degree in the respective subject. On acquiring Master Degree in the relevant subject, their posts will be up graded on case-to-case basis from BS-16 to BS-17 (Regular) and promotion (from BS-16 to BS-17) would be given as per laid down procedure and in accordance with the service rules to be framed. However, their existing seniority will remain intact". (Copy of Notification dated 13-11-2007 is Annx-C)

3. That in compliance of Notification dated 13-11-2007, 115-Male and 37-Female DPEs, including the appellant were promoted from BS-16 to BS-17 vide Notification No. SO(PE)/2-6/E&SE/DPC/DPEs dated 19-05-2009. However, seniority of all the incumbents/DPEs were remained intact in pursuance of the

Notification dated 13-11-2007. (Copy of Notification dated 19-05-2009 is Annx-D).

4. *That* in compliance of the consolidated judgment dated 04-03-2010 of the Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar in Service Appeals No. 1667/2009 under case titled Ghulam Nabi VS Govt; & other (12) connected Appeals, the 14-appellants/DPEs were promoted from BPS-16 to 17 on regular basis w.e.f 13-11-2007 instead of 19-05-2009 vide Notification bearing Endst: No. SO(PE) 9-10/DPE/Ghulam Nabi dated 29-04-2014. Moreover, the same benefits have also been extended to other similarly placed 116-DPEs (including the present appellant) who acquired the prescribed qualification on or before 13-11-2007. (Copy of Notification dated 29-04-2014 is Annx-E).
5. That it is pertinent to mention here that the promotion Notification bearing Endst: No. SO(PE) 9-10/DPE/Ghulam Nabi dated 29-04-2014 dated has been issued by the Department in continuation of the Notification bearing Endst: No. SO(PE)/2-6/E&SE/DPC/DPEs dated 19-05-2009 which was further based on the Notification dated 13-11-2007, wherein, the Seniority of the promoted DPEs was ordered to be remained intact, however, this fact has been concealed & mis-represented by the Respondent before this Honorable Tribunal & has thus got succeeded in obtaining the impugned order dated 27-07-2023 in her favor against the Rules & Criteria in vogue.
6. **That** in case of non-acceptance of the titled application by this Honorable Tribunal in spite of jurisdiction to entertain, it would open a flood gate for all the similarly placed Male & Female IPEs and resultantly would create huge litigation for the Department.
7. *That* the Respondent/appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of 1973, hence, the order dated 27-07-2023, being the result of mis-representation on the part of the Respondent/appellant is liable to be re-called in favor of the applicants/Department in the interest of justice, hence the Respondent Department further submit on the following grounds inter alia:-

ON GROUNDS

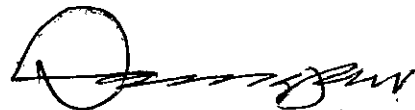
- A. *That* the appellant/Respondent has been treated as per law & rules in the final seniority list dated 02-03-2021 by the applicant/Respondent Department.

- B. *That* the act of the applicants/Respondent Department is within legal sphere and liable to be maintained in favor of the Respondents/Petitioners.
- C. *That* valuable legal rights are attached with the instants case of the Petitioners.
- D. *That* the instant application is within limitation & the Honorable Service Tribunal has failed to consider the facts & circumstances of the case prior to the announcement of the order dated 27-07-2023 of this Honorable Service Tribunal.
- E. *That* the appellant is habitual litigant against the Department for no cause of action accrued to her & this Honorable Service Tribunal did not consider the factual position of the case as mentioned above & has thus passed the impugned order dated 27-07-2021 without criteria against the applicants/Respondent Department which if implemented would amount to huge financial losses to the Government Treasury.
- F. *That* the appellant has been treated as per law by the Respondent Department. The act of Respondent Department is in accordance with the Constitution of the Islamic Republic of Pakistan, 1973 but the claim of the appellant was against the law, rule and policies of the Government.
- G. *That* the applicants/ Department has treated the Respondents/applicants appellants according to law, rule and policy. Hence the order dated 27-07-2022 is liable to be re-called.

PRAYER

It is therefore, humbly requested that on the acceptance of this application under Section 12 (2) CPC 1908, the order/judgment dated 27-07-2023 of this Honorable Tribunal in the titled appeal may kindly be set-aside in favor of the Applicants/E&SE Department in the interest of justice please.

Dated: ____/____/2023.



APPLICANTS/ DIRECTOR
Elementary & Secondary Education Khyber
Pakhtunkhwa Peshawar.

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

CM 12(2) CPC No. _____

In

Application No: _____/2023 in Service Appeal No.231/2022

Director Elementary & Secondary Education Department & othersApplicants.

VERSUS

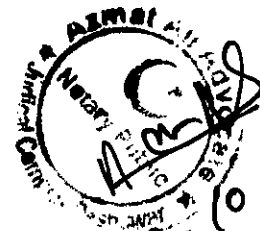
Rehana YasmeenRespondent

AFFIDAVIT

I, Dr. Hayat Khan Assistant Director (Litigation-II) E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Application under 12(2) CPC 1908 against the Judgment dated 27-07-2023 of this Honorable Service Tribunal in the titled Service Appeal are true & correct to the best of my knowledge & belief. It is further stated on oath that in this applicants/Department have neither been placed Ex-Parte nor their defense has been struck off by this Honorable Tribunal.

ATTESTED

Dependent



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Service Appeal No. 231/2022
Titled "Rehana Yasmeen-vs-Director Elementary and Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

ORDER
27th July, 2023

KALIM ARSHAD KHAN, CHAIRMAN: Learned counsel for the appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for official respondents present.

02. At the very outset learned counsel for the appellant produced copy of notification dated 29.04.2014 and contended that vide this notification the promotion of the appellant and others, mentioned in the notification from the post of Director Physical Education (DPE) (BPS-16 to BPS-17) on regular basis was given effect from 13.11.2007 instead of 19.05.2009. Learned counsel for the appellant submitted that in the impugned seniority list of 02.03.2021 the date of promotion of the appellant was still written as 19.05.2009 instead of 13.11.2007 and submitted that the appeal might be disposed of with the direction to the official respondents to incorporate the date of promotion of the appellant from BPS-16 to BPS-17 as 13.11.2007 in the impugned seniority list. The learned Additional Advocate General when confronted with the situation submitted that the department ought to have mentioned the correct date of promotion in the notification. The appeal is thus disposed of in the above terms. Costs to follow the event. Consign.

03. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 27th day of July, 2023.*

Attested
Assistant Director (Litiga.
E&SE Department
Khyber Pakhtunkhwa Peshawar

Attested

[Signature]
(Farzana Pual)
Member(Executive)

[Signature]
(Kalim Arshad Khan)
Chairman

[Signature]
EXA
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

**FINAL SENIORITY LIST OF SENIOR INSTRUCTORS PHYSICAL EDUCATION BS-18 (FEMALE) ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
KHYBER PAKHTUNKHWA AS STOOD 02-03-2021**

S.No	Name of Officer with Academic Qualification	Domicle	Date of Birth	D/O 1st Entry into Govt Service	D/O Apptr as DPE BS-16 (Regular)	D/O Award of BS-17 (Regular)	Regular Appr/Promotion to the present post			Place of Posting
							D/O Award of BS-18 (Regular)	BPS	Method or recruitment	
1	2	3	4	5	6	7	8	9	10	11
1	MST. SAFINA BADAR MSC (HPE)	NOWSHERA	06.01.1962	26/08/1990	26/08/1990	19/05/2009	23/05/2018	18	By promotion	GGHSS University Town Peshawar
2	MST. SHAHEEN ANWAR MSC (HPE)	ABBOTTABAD	03.06.1963	24/07/1991	24/07/1991	19/05/2009	23/05/2018	18	By promotion	GGHSS Abbottabad
3	MST. REHANA PARVEEN MSC (HPE)	D.I. KHAN	10.02.1963	24/07/1991	24/07/1991	19/05/2009	23/05/2018	18	By promotion	GGHSS Prova D.I. Khan
4	MST. SHAHIDA BEGUM MSC (HPE)	NOWSHERA	01.09.1967	07/01/1990	16/05/1997	19/05/2009	23/05/2018	18	By promotion	GGHSS Nowshera Kadan
5	MST. SHABNAM JADOON MSC (HPE)	ABBOTTABAD	05.04.1968	16/05/1997	16/05/1997	19/05/2009	23/05/2018	18	By promotion	GGHSS Dhanawan Abbottabad
6	MST. TAMSILLA NAZ MSC (HPE)	D.I. KHAN	31.08.1967	06/03/1990	16/05/1997	19/05/2009	23/05/2018	18	By promotion	R.I.T.E (F) D.I. Khan
7	MST. NAUREEN ANWAR MSC (HPE)	KOHAT	03.05.1968	16/05/1997	16/05/1997	19/05/2009	23/05/2018	18	By promotion	R.I.T.E (F) Peshawar
8	MST. SAEEDA BEGUM MSC (HPE)	PESHAWAR	01.01.1964	13/03/1986	18/02/2003	19/05/2009	23/05/2018	18	By promotion	GGHSS Chankani Peshawar
9	MST. MISBAH SEEMA MSC (HPE)	D.I. KHAN	14.05.1964	11/02/1992	18/02/2003	13/10/2010	23/05/2018	18	By promotion	GGHSS Chankani Peshawar
10	MST. RAHILA BANO MSC (HPE)	D.I. KHAN	24.03.1966	31/05/1992	18/02/2003	13/10/2010	23/05/2018	18	By promotion	GGHSS Chankani Peshawar
11	MST. RAFIA KHATTAK MSC (HPE)	KARAK	09.09.1967	16/11/1994	11/02/2003	19/05/2009	23/05/2018	18	By promotion	GGHSS No. 5 Quabon D.I. Khan
12	MST. HAMIDA BAGEM MSC (HPE)	D.I. KHAN	01.01.1967	11/01/1996	18/02/2003	19/05/2009	23/05/2018	18	By promotion	GGHSS Matra Peshawar
13	MST. ANIDA PARVEEN MSC (HPE)	ABBOTTABAD	20.10.1966	01/10/1992	18/02/2003	15/06/2009	23/05/2018	18	By promotion	GGHSS No. 9 Din Pur D.I. Khan
14	MST. ROBINA SHAHEEN MSC (HPE)	BANNU	02.01.1972	07/11/1992	18/02/2003	15/06/2009	23/05/2018	18	By promotion	GGHSS Malapur Abbottabad
15	MST. NABILA TABASUM MSC (HPE)	D.I. KHAN	25.04.1970	25/06/1997	18/02/2003	19/05/2009	23/05/2018	18	By promotion	GGHSS Sildar Khel Bata Bannu
16	MST. PARVEEN AKHTAR MSC (HPE)	MARDAN	15.11.1966	15/11/1984	18/02/2003	24/10/2013	18/04/2019	18	By promotion	GGHSS No. 3 Peshawar Cantt.
17	MST. DANISH BEGUM MSC (HPE)	MARDAN	14.04.1969	28/02/1995	18/02/2003	19/05/2009	23/05/2018	18	By promotion	GGHSS Akora Khattak NSR Assistant Director (Litigation & E&S Department) Khyber Pakhtunkhwa Peshawar
18	MST. SUGHA AFANDI MSC (HPE)	MARDAN	01.05.1970	10/10/1995	18/02/2003	15/06/2009	23/05/2018	18	By promotion	GGHSS Shah Daud Mardan
19	MST. YAHYA BEGUM MSC (HPE)	KARAK	08.06.1973	03/10/1995	06/06/2005	24/10/2013	18/04/2019	18	By promotion	GGHSS Ratan Khel Mardan
20	MST. NIGAR AKHTAR MSC (HPE)	MARDAN	03.04.1976	30/08/1995	06/06/2005	19/05/2009	23/05/2018	18	By promotion	GGHSS Pir Pail Nowshera
21	MST. NAHEED GOHAR MSC (HPE)	MANSEHRA	04.03.1969	17/03/1993	06/06/2005	16/05/2013	05/11/2018	18	By promotion	GGHSS Shaidu Nowshera
22	MST. MUFEDA BEGUM MSC (HPE)	SWABI	31.08.1971	11/12/1990	06/06/2005	16/05/2013	05/11/2018	18	By promotion	GGHSS Jangal Khel Kohat
23	MST. SAMINA AKHTAR MSC (HPE)	KARAK	15.03.1974	23/05/1992	06/06/2005	24/10/2013	18/04/2019	18	By promotion	GGHSS Shahar Garkh Mardan
24	MST. ASMA QUARSHI MSC (HPE)	PESHAWAR	06.06.1976	20/01/1995	06/06/2005	19/05/2009	23/05/2018	18	By promotion	GGHSS Peshawar City
25	MST. MUNAZA JABEEN MSC (HPE)	PESHAWAR	10.10.1975	23/11/1995	06/06/2005	19/05/2009	23/05/2018	18	By promotion	GGHSS L-5 Girth Peshawar
26	MST. AZRA NAZ MSC (HPE)	MARDAN	01.02.1970	08/03/1998	06/06/2005	19/05/2009	23/05/2018	18	By promotion	GGHSS Tamah Peshawar
27	MST. GHAZALA NAEEM MSC (HPE)	KOHAT	15.02.1968	01/01/1988	06/06/2005	13/10/2010	23/05/2018	18	By promotion	GGHSS Teni Mardan
28	MST. SUJHAT BEGUM MSC (HPE)	MARDAN	05.09.1972	30/09/1996	06/06/2005	15/06/2009	23/05/2018	18	By promotion	GGHSS Behab Chakarkot Kohat
29	MST. BASKRET AFZAL MSC (HPE)	MARDAN	20.02.1984	27/05/2006	27/05/2006	33/10/2010	23/05/2018	18	By promotion	GGHSS Talibhal Mardan
30	MST. ROHILA GUL MSC (HPE)	BANNU	12.10.1980	27/05/2006	27/05/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Bathian Mardan
										GGHSS Kori Sadat Bannu

Deputy Director (R&A)
 Elementary & Secondary Education
 Khyber Pakhtunkhwa Peshawar

Attested

 Assistant Director (Litigation & E&S Department)
 Khyber Pakhtunkhwa Peshawar

31	MST. SAIMA ANDALEEB MSC (HPE)	HARIPUR	05.04.1980	01/09/2004	27/05/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Koc Najibullah Haripur
32	MST. SHAIANA MSC (HPE)	BANNU	05.05.1983	27/05/2006	27/05/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Domel Bannu
33	MST. IMTAZ TABASSUM MSC (HPE)	PESHAWAR	15.12.1978	14/01/1998	27/05/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Jajiwara Peshawar
34	MST. SAIMA GUL MSC (HPE)	DI. KHAN	28.04.1979	27/05/2006	27/05/2006	15/06/2009	23/05/2018	18	By promotion	GGHSS Sherazi No. 8 Di Khan
35	MST. TASLEEM KAUSAR MSC (HPE)	MALAKAND	12.10.1974	27/05/2006	27/05/2006	16/05/2013	05/11/2018	18	By promotion	GGHSS Sakhtkot Malakand
36	MST. MIARYAM MUSTAFA MSC (HPE)	ABBOTTABAD	27.11.1978	27/05/2006	27/05/2006	19/05/2009	23/05/2018	18	By promotion	RITE (Female) Abbottabad
37	MST. FAKHAR-E-ANJUM MSC (HPE)	MARDAN	13.04.1977	01/12/1999	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Sawal Dher Mardan
38	MST. NIGHAT SEEMA MSC (HPE)	NOWSHERA	05.11.1970	13/03/1993	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Kala Khan Swabi
39	MST. MARYAM RASOOL MSC (HPE)	HARIPUR	07.01.1970	01/09/1993	12/12/2006	24/10/2013	18/04/2019	18	By promotion	GGHSS Kala Khan No. 2 Haripur
40	MST. SHAHEEN ALI MSC (HPE)	SWABI	12.12.1975	04/01/2001	12/12/2006	27/05/2009	23/05/2018	18	By promotion	GGHSS Shenz Swabi
41	MST. MUSSARU IQBAL MSC (HPE)	KARAK	08.01.1970	13/11/1990	12/12/2006	24/10/2013	18/04/2019	18	By promotion	GGHSS Esak Chutra Karak
42	MST. SARDAR BIBI MSC (HPE)	KARAK	30.05.1970	12/01/1994	12/12/2006	25/10/2011	23/05/2018	18	By promotion	GGHSS No. 1 Karak
43	MST. SHIBRAZ TAJ MSC (HPE)	MARDAN	09.11.1976	05/01/1996	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Gujrat Mardan
44	MST. AFSHEEN MUMTAZ MSC (HPE)	PESHAWAR	23.12.1974	20/11/1994	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Khyber Colony Peshawar
45	MST. SADIA HAZRAT MSC (HPE)	MALAKAND	05.03.1983	03/12/2004	12/12/2006	15/06/2009	23/05/2018	18	By promotion	GGHSS Kopar Malakand
46	MST. SHAHIDA BEGUM MSC (HPE)	KARAK	15.12.1976	17/05/1995	12/12/2006	24/10/2013	18/04/2019	18	By promotion	GGHSS Esak Chutra Karak
47	MST. RAHANA YASMEEN MSC (HPE)	PESHAWAR	30.04.1971	17/11/1994	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Wadpaga Peshawar
48	MST. HUSSAN BASRI MSC (HPE)	PESHAWAR	02.03.1972	10/07/1997	12/12/2006	19/05/2009	23/05/2018	18	By promotion	GGHSS Landi Arab Peshawar
49	MST. SAIRA ILTAF MSC (HPE)	ABBOTTABAD	01.01.1981	26/06/2005	12/12/2006	15/06/2009	23/05/2018	18	By promotion	GGHSS Kakul Abbottabad
50	MST. NAZMA SHAHEEN MSC (HPE)	PESHAWAR	30.05.1977	01/10/1996	12/12/2006	16/05/2013	05/11/2018	18	By promotion	GGHSS Larana Peshawar
51	MST. ROBINA SHAHEEN MSC (HPE)	MARDAN	24.01.1965	04/02/2005	10/02/2009	15/06/2009	23/05/2018	18	By promotion	GGHSS Rashakai Mardan
52	MST. RIFFAT SHAHEEN MSC (HPE)	MANSEHRA	01.03.1967	19/02/2004	10/02/2009	15/06/2009	23/05/2018	18	By promotion	GGHSS Baffa Manshera
53	MST. ARIFA SALEEM MSC (HPE)	PESHAWAR	01.09.1972	20/10/1993	10/02/2009	15/06/2009	23/05/2018	18	By promotion	GGHSS Nishtar Atod Peshawar

Certificate:-

- 1 That the Seniority list is widely circulated.
- 2 That the Seniority list is undisputed/uncontroversial.
- 3 That there is no litigation pending/involved.

Deputy Director (F & A)
 Elementary & Secondary Education
 Khyber Pakhtunkhwa

Assistant Director (Litigation,
 E&SE Department
 Khyber Pakhtunkhwa Peshawar

NOTIFICATION.

No. SOG/S&L/1-69/06/Vol-1/DPE/LIB: Sanction of the competent authority is hereby accorded to the upgradation of the posts of Librarians and Directors Physical Education (D.P.Es) from BS-16 to BS-17 (Regular) for the existing incumbents who hold Master Degree in the relevant subject in the Schools & Literacy Department NWFP with immediate effect as per following details:-

- 1) Promotion against the upgraded posts (from BS-16 to BS-17) shall be made in the prescribed manner, and in accordance with the service rules to be framed as per relevant provisions of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules 1989 read with the NWFP Civil Servants Act, 1973.
- 2) The Librarians and D.P.Es who hold the diploma in the relevant subject will stay in BS-16 till such time, they acquire Master degree in the respective subject. On acquiring Master Degree in the relevant subject, their posts will be upgraded on case to case basis from BS-16 to BS-17 (Regular) and promotion (from BS-16 to BS-17) would be given as per laid down procedure and in accordance with the service rules to be framed. However their existing seniority will remain intact.
- 3) All the vacant posts of Librarians and D.P.Es in Schools & literacy department in BS-16 are hereby upgraded to BS-17. appointments against which would be made from amongst the persons who hold Master degree in the relevant subject, in the prescribed manner.
- 4) In future Librarians and D.P.Es will initially be recruited on the basis of Master degree in the relevant subject in BS-17 (Regular).
- 5) Henceforth no appointment of Librarians and D.P.Es in BS-16 shall be made on the basis of diploma, being declared as "Dying Cadre".

Asst. Dir.
Assistant Director (Litigation)
E&SE Department
Khyber Pakhtunkhwa Peshawar

Sd/-

SECRETARY TO GOVERNMENT OF NWFP
SCHOOLS & LITERACY DEPARTMENT.

Endst: No. FD (SOSR-II) 10-7/03/VOL.- III Dated, Peshawar the, 13/11/2007

Copy is forwarded for information and necessary action to :-

- 1) The Accountant General, NWFP, Peshawar.
- 2) All District Accounts Officers in NWFP.
- 3) All Agency Accounts Officers in NWFP.

(Signature)
(MUNAWAR KHAN)

SECTION OFFICER (SR-11)
FINANCE DEPARTMENT
GOVERNMENT OF NWFP.

(P.T.O.)

S.No	Name & Designation of Officers	Place of Posting	Remarks
102.	Muhammad Ashfaq, DPE	GHSS Lachi Kohat	-do-
103.	Mr.Mahboob Ali, DPE	GHSS Bilogram Swat	Already occupied by him.
104.	Mr. Taj Ali Khan DPE,	GHSS Pirpai Nowshera	-do-
105.	Mr.Shoukat-ur-Rehman DPE working as <u>SS</u> GHSS No.2 DIK	GHSS Ustar Zai Kohat	Against vacant post.
106.	Mr. Dil Faraz Khan, DPE,	GHSS Ismail Khel Bannu	Already occupied by him.
107.	Mr. Muhammad Kaleem DPE	GHSS Mian Brangola Dir lower	-do-
108.	Mr Alan Zar DPE	GCPE Karak	-do-
109.	Mr. Ayaz Ali DPE	GHSS Utmanzai Charsadda	-do-
110.	Mr. Muhammad Ishaq DPE	GHSS Khal Dir lower	-do-
111.	Mr. Muhammad Safdar Luqman DPE working as <u>SS</u> GHSS Ramak D.I.Khan	GHSS Sari Kot, Haripur	Against vacant post.
112.	Mr. Jamshad Ali Khan DPE	GHSS Khairabad NSR	Already occupied by him.
113.	Mr Abdul Hamid DPE	GHSS Bareela Haripur	-do-
114.	Mr Taj Wali DPE	GHSS Nisatta Charsadda	-do-
115.	Mr Khalid DPE	GHSS Dakki Charsadda	-do-

FEMALE DPES

Assistant Director (Litigation)
E&SE Department
Khyber Pakhtunkhwa Peshawar

S.No	Name & Designation of Officers	Place of Posting	Remarks
1.	Mst. Naghma Akbar DPE	GGHSS G.Wala Bannu.	Already occupied by her.
2.	Mst. Mussarat Parveen DPE	GGHSS Jangal Khel Kohat	-do-
3.	Mst. Dilshad Begum DPE	GGHSS Bannu City	-do-
4.	Mst. Safina Babar DPE	GGHSS University Town Peshawar	-do-
5.	Mst. Shaheen Anwar DPE	GGHSS K..Najibullah Haripur	-do-
6.	Mst. Rehana Parveen DPE	GGHSS No.2. D.I.Khan	-do-
7.	Mst. Shahida Begum DPE	GGHSS Nowshera Kalan	-do-
8.	Mst. Shabnam Jadoon DPE	GGHSS Dhamtour A/Abad	-do-
9.	Mst. Tamsella Naz DPE	GGHSS Pharpur D.I.Khan	-do-
10.	Mst. Naureen Anwar DPE	GGHSS B.S.D Peshawar.	-do-
11.	Mst. Nadia Bagum working as AD E&SE NWFP Pesh.	GGHSS Shaidu, Nowshera	Against vacant post. After actualization of her promotion she will take over charge as Asstt Directress Litigation Directorate of E& SE.



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**GOVERNMENT OF NORTH-WEST FRONTIER PROVINCE
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**

NOTIFICATION

Peshawar, Dated: 19-05-2009

NO.SO(PE)2-6/E&SE/DPC/LIB/DPEs(BS-16 TO BS-17)/09: Consequent upon the recommendations of the Departmental Promotion Committee, the competent authority is pleased to promote the following One hundred & Fifteen (115 Male) & Thirty Eight (38 Female) DPEs from BS-16 to BS-17 according to their seniority on regular basis with immediate effect:-

S.No	Name & Designation of Officers	Place of Posting	Remarks
MALE DPEs			
1.	Mr. Bahadar Sher DPE	GHSS Bannu	Already occupied by him
2.	Mr. Asmatullah DPE	GHSS Sheikhan Peshawar	-do-
3.	Mr. Talat Mahmood DPE	GHSS No.4. Peshawar City	-do-
4.	Mr. Hazrat Ali DPE	GCPE Karak	-do-
5.	Mr. Shamsul Islam DPE	GHSS Mosazai Peshawar	-do-
6.	Mr. Tajamul Zaman DPE	GHSS No.4 D.I.Khan	-do-
7.	Muhammad Shan DPE	GHSS No. 3 D.I.Khan	-do-
8.	Mr. Gulistan DPE working as ADO (Sports) EDO E&SE D.I.Khan	GHSS Kalkot Dir Upper	Against vacant post.
9.	Mr. Anwar Zad Khan DPE	GHSS Nurar Bannu	Already occupied by him.
10.	Mr. Khalid Tanveer DPE	GHSS Hassan Zai Charsadda	-do-
11.	Mr. Misal Khan DPE working as ADO (Sports) EDO E&SE Peshawar	GHSS No1 Peshawar City.	Vice S.No.40 who has been adjusted at GHSS Ziarat Kaka Sahib Nowshera
12.	Mr. Sarwar Shah DPE	GHSS No. 1 Mardan	Already occupied by him.
13.	Mr. Abdul Jamil DPE	GHSS Domal FR Bannu	-do-
14.	Mr. Sher Kamal DPE	GHSS Hatian Mardan	-do-
15.	Mr. Hussain Wali DPE working as ADO Sports in o/o EDO (E&SE) Chitral	GHSS Darosh Chitral	Against Vacant Post
16.	Mr. Istam Rosh DPE	GHSS Mardan	Already occupied by him.
17.	Muhammad Bashir DPE	GHSS Dhodial Mansehra	-do-
18.	Gul Aslam Khan DPE	GHSS Aba Khel Lakki	-do-
19.	Mr. Said Nawaz DPE	GHSS Jabangiri Karak	-do-
20.	Mr. Abdul Sarwar DPE working as ADO (Sports) EDO E&SE Bannu	GHSS Towda China, Dir Lower	Against vacant post.
21.	Mr. Sami Ullah DPE	GHSS Nawansher, Abbottabad	Already occupied by him
22.	Mr. Fazli Baqi DPE	GHSS Warai Dir Upper	-do-
23.	Mr. Iftikhar Ahmad DPE	GHSS Wazir Bagh Peshawar	-do-
24.	Muhammad Ali DPE	GHSS Takht Bai	-do-
25.	Muhammad Naem DPE	GHSS, Chamtar Mardan	Already occupied by him.
26.	Mr. Ali Badshah DPE	GHSS Gumbat Kohat	-do-

Assistant Director (Litigat)
E&SE Department
Khyber Pakhtunkhwa Peshawar

No	Name & Designation of Officers	Place of Posting	Remarks
12.	Mst. Shahnaz Begum DPE	GGHSS Shah Said Munawar D.I.Khan	Already occupied by her.
13.	Mst. Rafia Khattak DPE	GGHSS Shabqadar Fort Charsadda	-do-
14.	Mst. Hamida Bagem DPE	GGHSS Kulachi D.I.Khan	-do-
15.	Mst. Nabila Tabasum DPE working as Librarian GGHSS Chamkani Pesh.	GGHSS Rashakai, Nowshera.	Against vacant post.
16.	Mst. Saceda Begum DPE	GGHSS Chamkani Peshawar.	Already occupied by her.
17.	Mst. Danish Begum DPE	GGHSS Shah Dhand Mardan.	-do-
18.	Mst. Shabnam Raza DPE	GGHSS Shakardara Kohat	-do-
19.	Mst. Nigar Akhtar DPE	GGHSS Shabazghari Mardan	-do-
20.	Mst. Zahida Khatoon DPE	GGHSS Chokara Kohat	-do-
21.	Mst. Naheed Gohar DPE	GGHSS Babri Banda Kohat	-do-
22.	Mst. Asma Quarshi DPE	GGHSS Belitang Kohat	-do-
23.	Mst. Munaza Jabeen DPE	GGHSS Sherpao Charsadda	-do-
24.	Mst. Azra Naz DPE	GGHSS Toru Mardan	-do-
25.	Mst. Adeeba Naheed DPE	GEC (F) Jamrud Khyber Agency	-do-
26.	Mst. Sajida Sofi DPE.	GGHSS Com. Peshawar	-do-
27.	Mst. Rahila Gui DPE	GGHSS Gumbat Kohat	-do-
28.	Mst. Shahana DPE	GGHSS Kaki Bannu	-do-
29.	Mst. Maryam Mustafa DPE	GGHSS Havelian A. Abad	-do-
30.	Mst. Saima Andaleeb DPE	GGHSS Pannian Haripur	-do-
31.	Mst. Imtiaz Tabassum DPE	GGHSS Pirpai Nowshera	-do-
32.	Mst. Fakhar-E-Angum DPE	GGHSS Hatian Mardan	-do-
33.	Mst. Nighat Seema DPE GGHSS Sherwan A/Abad	AD (PE & S) Director Curri & Teacher Edu: NWFP at A/Abad	-do-
34.	Mst. Sheraz Taj DPE	GGHSS Sawal Dher Mardan	-do-
35.	Mst. Afsheen Mumtaz DPE	GGHSS Kalabat Swabi	-do-
36.	Mst. Rehana Yasmeen	GGHSS Kabal Swat	-do-
37.	Mst. Hassan Basri DPE	GGHSS Topi Swabi	-do-
38.	Mst. Sajida Nousheen DPE	GGHSS Lady Grifh Peshawar	-do-

Assistant Director (Litigation)
E&SE Department
Khyber Pakhtunkhwa Peshawar.

SECRETARY TO GOVT OF NORTH-WEST FRONTIER PROVINCE
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst; of even no. & date:

Copy is forwarded to:-

- 1) Secretary to Govt of NWFP, Establishment Department, Peshawar.
- 2) Special Secretary (Regulation), Establishment Department, Govt of NWFP Peshawar.
- 3) Secretary to Govt. of NWFP, Finance Department, Peshawar.
- 4) Secretary to Chief Minister NWFP.
- 5) PS to Chief Secretary NWFP.
- 6) All Directors in Elementary & Secondary Education Department NWFP.
- 7) All District Coordination Officers in NWFP.
- 8) All Executive District Officers Elementary & Secondary Education in NWFP.
- 9) All Executive District Officers (Finance & Planning) in NWFP.
- 10) The Accountant General NWFP.
- 11) All District / Agency Accounts Officers in NWFP.
- 12) Director Information NWFP Peshawar with the request to give wide publicity through media.
- 13) Secretary, NWFP Public Service Commission Peshawar.

- 14) All Section Officer/ Planning Officers / Statistical Officers, E&S Edu: Deptt: Govt of NWFP.
- 15) Deputy Database Administrator (EMIS) Elementary & Secondary Education Peshawar.
- 16) PS to Minister for Education (Elementary & Secondary) NWFP.
- 17) PS to Secretary / Special Secretary / Additional Secretary E&S Edu: Deptt Govt of NWFP.
- 18) PA to Deputy Secretary (Admn) Elementary & Secondary Edu: Department Govt of NWFP.
- 19) PA to Chief Planning Officer Elementary & Secondary Education Department Govt of NWFP.
- 20) ~~Officers concerned~~
- 21) Master file

Arif Jamil
 Assistant Director (Litigation)
 E&SE Department
 Khyber Pakhtunkhwa Peshawar

Arif Jamil
 (ARIF JAMIL)
 SECTION OFFICER (PRIMARY)



ADDE
2/5/2014

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Dated Peshawar the 29-04-2014.

A.D.C. (Sports)

24/5/2014

ADCS
4/5/5

NOTIFICATION.

NO.SO(PE)9-10/DPE/Ghulam Nabi. In pursuance of the judgement of Khyber Pakhtunkhwa Service Tribunal Peshawar dated 4-3-2010 in appeal No. 1667/2009 (Ghulam Nabi) 1668/2009 (Sarwar Shah), 1669/2009 (Muhammad Naeem), 1670/2009 (Sardar Khan), 1671/2009 (Sabir Ali), 1672/2009 (Muhammad Israr), 1673/2009 (Sher Kamal), 1674/2009 (Salar Khan), 1675/2009 (Muhammad Nawaz), 1676/2009 (Azra Naz), 1677/2009 (Danish Begum), 1678/2009 (Sheraz Taj), 1679/2009 (Muhammad Ali) and 1680/2009 (Chamni Khan), the competent authority is pleased to promote the following Directors Physical Education (DPEs) BS-16 To BS-17 on regular basis w.e.f; 13-11-2007 instead of 19-5-2009 as notified vide this department No. SO(PE)/2-6/E&SE/DPC/DPEs dated 19-5-2009:-

S. No.	Name & Designation	Date of acquiring Master Degree in Physical Education
1	Ghulam Nabi DPE	20-11-1995
2	Sarwar Shah DPE	30-5-2005
3	Muhammad Naeem DPE	24-8-1993
4	Sardar Khan DPE	7-1-1993
5	Sabir Ali DPE	21-12-2002
6	Muhammad Israr DPE	30-5-2005
7	Sher Kamal DPE	30-5-2005
8	Salar Khan DPE	23-10-1994
9	Muhammad Nawaz DPE	19-9-2006
10	Azra Naz DPE	30-5-2005
11	Danish Begum DPE	23-6-2007
12	Sheraz Taj DPE	1-12-2007
13	Muhammad Ali DPE	30-5-2005
14	Chamni Khan DPE	30-5-2005

Assistant Director (Litigation)
E&SE Department
Khyber Pakhtunkhwa Peshawar

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6/5

2. The competent authority has further been pleased to promote the following DPEs who acquired prescribed qualification on or before 13-11-2007 but they did not challenge this department notification of even No. dated 19-5-2009:

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57	Mr. Hakim Said DPE	17-7-1996
58	Mr. Qaiser Khan DPE	17-7-1997
59	Mr. Hukam Zad DPE	17-7-1999
60	Mr. Muhammad Alam DPE	23-6-2007
61	Mr. Muhammad Shahidullah DPE	20-6-1995
62	Mr. Muhammad Khalil DPE	12-11-1997
63	Mr. Noor Muhammad Shah DPE	29-5-1998
64	Mr. Murad Ali DPE	17-7-1999
65	Mr. Muhammad Ghani DPE	24-8-1993
66	Mr. Hazrat Ali DPE	02-09-1999
67	Mr. Arshad Hussain DPE	2-8-1994
68	Mr. Nowsher Zaman DPE	23-2-1999
69	Mr. Muhammad Kaleem DPE	05-2-2008
70	Mr. Kaleemullah Khan DPE	6-5-2006
71	Mr. Wajid Ali DPE	30-5-2005
72	Mr. Fariq Gul DPE	16-6-1999
73	Mr. Muhammad Ayaz DPE	17-6-1998
74	Mr. Taimur Rizaz DPE	12-12-2001
75	Mr. Naik Zada DPE	6-5-2006
76	Mr. Yousaf Khan DPE	18-11-1996
77	Mr. Muhammad Ashfaq	27-8-2007
78	Mr. Mahboob Ali DPE	6-5-2006
79	Mr. Shaukatur Rahman DPE	17-6-1998
80	Mr. Dil Faraz Khan DPE	6-5-2006
81	Mr. Muhammad Kaleem DPE	12-12-2001
82	Mr. Alamzar Khan DPE	30-5-2005
83	Mr. Muhammad Ishaq DPE	1-6-2004
84	Mr. Muhammad Safdar Luqman DPE	30-5-2005

Asst. Dir.
Assistant Director (Litigation)
E&SE Department
Khyber Pakhtunkhwa Peshawar

Female

1.	Mst. Naghma Akbar DPE	6-6-1984
2.	Mst. Mussarat Parveen DPE	6-6-1984
3.	Mst. Dilshad Begum DPE	3-11-1990
4.	Mst. Shaheen Anwar DPE	15-3-1992
5.	Mst. Rehana Parveen DPE	3-11-1990
6.	Mst. Shahida Begum DPE	20-11-1995
7.	Mst. Shabnam Jadoon DPE	1-12-1994
8.	Mst. Tamseela Naz DPE	15-3-1992
9.	Mst. Noreen Anwar DPE	24-8-1993
10.	Mst. Shehnaz Begum DPE	24-8-1993
11.	Mst. Rafia Khattak DPE	17-6-1998
12.	Mst. Hamida Begum DPE	24-8-1993
13.	Mst. Nabeela Tabbasum DPE	16-9-1998
14.	Mst. Saeeda Begum DPE	30-5-2005
15.	Mst. Shabnum Raza Malik DPE	1-6-2004
16.	Mst. Nigar Akhtar DPE	9-9-2005
17.	Mst. Rehana Khatoon DPE	31-12-1989
18.	Mst. Naheed Gohar DPE	21-12-2002
19.	Mst. Asma Qureshi DPE	6-5-2006
20.	Mst. Munaza Jabeen DPE	6-5-2006
21.	Mst. Adeeba Naheed DPE	6-5-2006
22.	Mst. Sajida Sofi DPE	19-9-2006
23.	Mst. Rahila Gul DPE	30-5-2005
24.	Mst. Shahana DPE	6-5-2006
25.	Mst. Mariam Mustafa DPE	1-8-2002
26.	Mst. Saima Andaleep DPE	30-5-2005
27.	Mst. Imtiaz Tabbasum DPE	6-5-2006
28.	Mst. Fakhre Anjum DPE	12-12-2001

Attested
Assistant Director (Litigation)
E&SE Department
Khyber Pakhtunkhwa Peshawar

29.	Mst. Nighat Seema DPE	1-6-2004
✓ 30.	Mst. Afsheen Mumtaz DPE	6-6-2006
✓ 31.	Mst. Rehana Yasmin DPE	6-5-2006
✓ 32.	Mst. Hassan Basri DPE	6-5-2006

SECRETARY

Endst. No. SO(PE)9-10/DPE/Ghulam Nabi.

Dated Pesh: the, 29-04-2014

Copy forwarded to:-

1. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. Special Secretary (Regulation), Establishment Department.
3. Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department w/r to his letter No. SO(FR)/FD/10-22/9-10/ DATED 12-7-2012.
4. Secretary to Chief Minister Khyber Pakhtunkhwa.
5. PS to Chief Secretary Khyber Pakhtunkhwa.
6. All Directors in Elementary & Secondary Education Department. *E&SE, K.P., Peshawar*
7. Director Education FATA Warsak Road Peshawar.
8. All Commissioners/Deputy Commissioners in Khyber Pakhtunkhwa.
9. All District Education Officers (M/F) Elementary & Secondary Education in Khyber Pakhtunkhwa.
10. All Agency Education Officers in FATA.
11. Director Information Khyber Pakhtunkhwa Peshawar with the request to give wide publicity through media.
12. Secretary Public Service Commission Khyber Pakhtunkhwa, Peshawar.
13. PS to Minister E&SE Department.
14. PS to Secretary / Special Secretary / Additional Secretary E&SE Department Gov. of Khyber Pakhtunkhwa.
15. PA to Deputy Secretary (Admn.) Khyber Pakhtunkhwa.
16. Officers concerned.

Zamin Khan Momand
(ZAMIN KHAN MOMAND)
SECTION OFFICER (PRIMARY)

Attested
Assistant Director (Litigation)
E&SE Department
Khyber Pakhtunkhwa Peshawar

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

AUTHORITY LETTER

I Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar do hereby authorize Mr. Muhammad Imran Assistant (Litigation) of this Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar to attend the Khyber Pakhtunkhwa Service Tribunal in connection with filing of para wise comments in Service Appeal No. 231/2022 Titled Rehana Yasmeen vs Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department.

Dated 18/10/2023

Director

Elementary & Secondary

Education

Khyber Pakhtunkhwa Peshawar.